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HUMAN RIGHTS POLICY

ARTICLE 1. PURPOSE AND SCOPE

The purpose of this Human Rights Policy (the “Policy”) is to set out the principles and guidelines for ensuring respect for human rights in all activities of Akfen Holding Anonim Sirketi (“Akfen Holding” or the “Company”) and its subsidiaries (Akfen Holding and its subsidiaries collectively referred to as the “Companies”), in accordance with national legislation and international conventions to which the Companies are party.

All managers and employees of the Companies are required to act in accordance with the Policy. Under this Policy, all persons, suppliers, business partners, institutions and organizations with whom the Companies have relationships for the supply of goods or services in all geographies where they operate, as well as their employees and all stakeholders with whom they have business relationships, are expected to act in compliance with the Policy to the extent applicable.

ARTICLE 2. DEFINITIONS

The specific terms and concepts used in this Policy are briefly defined below:

Discrimination refers to unequal treatment of individuals on the basis of gender, age, language, religion, ethnic origin, disability, marital status or any other similar difference.

United Nations Global Compact (UN Global Compact) refers to the voluntary corporate sustainability initiative launched by the United Nations, which aims to ensure that companies comply with the ten universally accepted principles in the areas of human rights, labour standards, the environment and anti-corruption and integrate these principles into their business processes.

UN refers to the United Nations.

ILO refers to the International Labour Organization.

ILO Declaration on Fundamental Principles and Rights at Work refers to the international declaration adopted by the ILO, which defines the fundamental principles of labour that member states are obliged to respect, promote and support in good faith even if they have not ratified the relevant conventions (freedom of association and right to collective bargaining, elimination of forced or compulsory labour, abolition of child labour, and elimination of discrimination in respect of employment and occupation).

Human Rights refer to the fundamental rights and freedoms defined in the United Nations Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO), and to the rights inherent to all human beings regardless of gender, race, colour, religion, language, age, nationality, differences of opinion or differences in property, including the right to a life of equality, freedom and dignity.

Suppliers and Business Partners refer to all persons, suppliers, business partners, institutions and organizations with which the Companies have a relationship for the supply of goods or services, as well as their employees and all stakeholders with whom they have business relationships.

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Forced Labour refers to requiring a person to work against his/her will through threats or coercion.

ARTICLE 3. PRINCIPLES AND GUIDELINES

Akfen Holding systematically implements its approach to respecting human rights in accordance with the principles and guidelines set out below:

Compliance with International Standards:

Human rights practices are carried out based on internationally recognized standards, particularly the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. As a signatory to the United Nations Global Compact (UN Global Compact), Akfen Holding undertakes to comply with the universal principles established in the areas of human rights, labour standards, the environment and anti-corruption and to integrate these principles into all its business processes.

Akfen Holding focuses on fulfilling and complying with the requirements of international conventions to which Türkiye is a party in this regard, particularly the fundamental principles of the International Labour Organization, a specialized agency of the United Nations working to improve human rights, social justice and labour rights.

Health and Safety:

Akfen Holding considers ensuring healthy and safe working conditions for all employees to be one of its fundamental responsibilities. In this context, practices aimed at protecting the physical and psychological integrity of employees are implemented, and necessary measures are taken to prevent occupational health and safety risks.

Compliance with the applicable legislation and international standards is ensured to maintain safe, healthy and sustainable working environments, and training and awareness-raising activities are carried out to increase employees' awareness in this regard.

Working Hours and Rest Rights:

Working hours, overtime, leave and rest periods are regulated in accordance with the applicable legislation and international standards, and employees are ensured to fully benefit from regular breaks, annual leave and other statutory rights. Sustainable working models are supported, taking work-life balance into consideration.

Remuneration:

The remuneration approach is determined within a competitive framework, taking internal and external factors into account, and all practices, including fringe benefits and overtime payments, are carried out in full compliance with the applicable legal regulations.

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The principles of transparency and fairness are observed in remuneration processes, and employees' rights are ensured to be fully protected. The policies, principles and practices relating to remuneration are defined under the "Akfen Holding Remuneration Policy".

Freedom of Expression and Culture of Dialogue:

An environment of communication based on mutual respect and trust, in which employees can freely express their views, expectations and suggestions, is encouraged, and business processes are carried out within the framework of an open and inclusive approach to communication with employees.

Freedom of Association and Right to Collective Bargaining:

Employees' rights to establish or join trade unions and participate in collective bargaining processes within the framework of the applicable legislation and international conventions are respected, and no obstructive practices that prevent the exercise of these rights are tolerated.

Zero Tolerance for Child Labour and Forced Labour:

Akfen Holding strongly opposes child labour that causes physical and psychological harm to children and deprives them of their right to education. Akfen Holding also opposes all forms of forced labour, which is defined as working involuntarily and under threat.

Akfen Holding maintains a zero-tolerance policy towards slavery and human trafficking in accordance with the conventions and recommendations of the International Labour Organization, the Universal Declaration of Human Rights and the Global Compact, and expects all suppliers and business partners to act accordingly.

Diversity and Equal Employment Opportunities:

Akfen Holding acts with the awareness that differences are among the fundamental elements of corporate development and sustainable success and considers diversity, equality and inclusion an integral part of its way of doing business. In this context, equal opportunities are ensured across all business processes, particularly with regard to gender balance.

In evaluating candidates, no difference, particularly gender, is taken into consideration as a basis for discrimination; selection processes are conducted solely on the basis of competencies, experience and job requirements.

In this context, efforts to increase women's participation in the workforce and their representation in technical fields and leadership positions are supported, and inclusive recruitment practices and related development programs are implemented.

An inclusive working environment is created in which all employees can feel valued and included, and awareness-raising activities are carried out to prevent bias and exclusionary behaviour.

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Prevention of Discrimination:

Akfen Holding does not tolerate discrimination on the basis of language, religion, race, ethnic origin, gender, age, disability or any other similar difference. It is essential that all employees work in an equal and fair working environment, and a zero-tolerance approach is adopted towards discrimination and harassment. In this context, policies, procedures and practices aimed at preventing the risks of discrimination and harassment are developed, and the effectiveness of such practices is regularly monitored and improved.

Zero Tolerance for Harassment and Violence:

Akfen Holding adopts a zero-tolerance approach to any form of harassment, violence, bullying or threatening behaviour that may undermine the dignity of employees. No inappropriate behaviour, including physical, psychological or verbal harassment, is accepted, and it is essential to establish a safe working environment based on respect for all employees.

Reports concerning such behaviour are addressed in accordance with the principles of confidentiality and impartiality, and where a violation is identified, the necessary disciplinary and/or legal processes are decisively implemented. The effective functioning of mechanisms through which employees can report such situations in a safe manner is ensured.

Provision of Development Opportunities:

The personal and professional development of employees is considered one of the priority areas. In this regard, a continuous learning approach is adopted by taking employees' development needs into consideration, and the acquisition of existing and future required competencies is targeted.

Development processes are supported through career and learning journeys designed to address employees' specific needs, innovative training methods and practices that encourage the sharing of experience. In this context, a working environment is provided in which employees can continuously develop their knowledge and competencies.

Social Impact and Responsibility:

In all countries where the Companies operate, activities are carried out with respect for human rights as a fundamental principle, healthy communication is established with local communities, and practices that support sustainable development are implemented.

Protection of Personal Data:

Akfen Holding addresses the protection of the personal data and information of employees, customers and business partners in line with the principle of respecting privacy and fundamental rights and freedoms. In this context, the necessary technical and administrative measures are taken to prevent the sharing of personal data with unauthorized persons, and full compliance with the relevant legal regulations is ensured. The application of high standards in data protection processes is considered essential.

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Employees are expected to comply with the policies and practices established for the protection of personal data during business processes.

Prevention, Monitoring and Sanctions for Violations:

Policies, procedures and control mechanisms are established to prevent human rights violations; systematic monitoring and continuous improvement processes are implemented, particularly with respect to forced labour, discrimination and other critical human rights risks.

No practice that is inconsistent with the Human Rights Policy and the Business Ethics Rules and Codes of Ethics is accepted. Where a violation is identified, the relevant circumstances are thoroughly investigated, and the necessary disciplinary and/or legal processes are decisively implemented.

ARTICLE 4. DUTIES AND RESPONSIBILITIES

4. 1. Board of Directors

The Board of Directors is responsible for establishing the general framework of the human rights approach and overseeing its effectiveness.

4.2. Senior Management

Senior Management is responsible for ensuring the implementation of the Policy, allocating the necessary resources and monitoring the relevant processes.

4.3. Employees

Employees are responsible for acting in accordance with the principles set out in the Policy and reporting any potential violations.

4.4. Human Resources and Relevant Departments

Human Resources and the relevant departments are responsible for identifying and monitoring human rights risks and taking the necessary actions. The Human Resources Department is the department responsible for implementing the Policy.

4.5. Suppliers and Business Partners

Suppliers and Business Partners are required to act in compliance with the Policy and to ensure respect for human rights in their own operations.

ARTICLE 5. CONTACT

E-mail: surdurulebilirlik@akfen.com.tr

Address: Ankara Merkez Ofis Kazim Ozalp Mahallesi, Koza Caddesi No:22 Çankaya Ankara / Türkiye 06700

ARTICLE 6. REPORTING AND NOTIFICATION

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Reports and notifications regarding feedback on the Policy and potential violations and instances of non-compliance may be submitted by email to etik@akfen.com.tr.

Reports and notifications received shall be assessed in accordance with the principle of confidentiality. The identities of reporting persons shall be protected, and no retaliation shall be taken against them.

Akfen Holding shall assess all reports and notifications submitted to them in accordance with the applicable legislation and internal regulations and shall take the necessary actions.

ARTICLE 7. REVIEW

This Policy shall be reviewed by the Sustainability Committee annually or in the event of a significant change in the applicable legislation, the activities of the Companies or their organizational structure, taking into account changes in processes and technical infrastructure. The Policy, once reviewed and updated where necessary, shall enter into force on the date of its publication upon approval by the Board of Directors.

ARTICLE 8. EFFECTIVE DATE

This Policy was adopted pursuant to the resolution of Akfen Holding's Board of Directors dated 10.09.2026 and entered into force on the date of its publication.

This Policy shall remain in force unless repealed or amended by the Board of Directors.

ARTICLE 9. RELATED POLICIES AND PROCEDURES

Human Resources Policy
Business Ethics Rules and Codes of Ethics
Diversity, Equity and Inclusion Policy
Gender Equality Policy