

ARTICLE 1 – PURPOSE

1.1. The **Human Rights Policy** (hereinafter referred to as the “Policy”) aims to define the human rights principles and standards adopted and implemented by **Beta Enerji ve Teknoloji A.Ş.** (hereinafter referred to as the “Company”) during its operations, and to serve as a guide for its employees, business partners, suppliers, and the entire value chain on this matter.

1.2. This Policy has been prepared based on the **Universal Declaration of Human Rights**, the **United Nations (UN) Global Compact**, the **UN Convention on the Rights of the Child**, the **Core Conventions of the International Labour Organization (ILO)**, the **OECD Guidelines for Multinational Enterprises**, the **UN Guiding Principles on Business and Human Rights**, and local regulations.

ARTICLE 2 – DEFINITIONS

2.1. This section briefly explains the specific terms and concepts used in the Policy:

Company: Beta Enerji ve Teknoloji A.Ş.

Policy: Human Rights Policy.

Employee: Company’s managers and employees.

ARTICLE 3 – SCOPE

3.1. This Policy applies to:

- a) The Company’s Board of Directors,
- b) Company Employees,
- c) Companies from which goods and services are procured, along with their employees,
- d) Other individuals and entities acting on behalf of the Company—including consultants, lawyers, advisors, and external auditors—as well as customers and other persons with whom the Company maintains commercial relations (“Business Partners”).

ARTICLE 4 – PRINCIPLES AND GUIDELINES

4.1. The Company complies with the 10 principles of the United Nations Global Compact, of which it is a signatory, as well as other universal standards, societal values, and local regulations related to human and employee rights in all of its operations.

4.2. Respect for Human Rights

4.2.1. The Company conducts its relationships with employees, business partners, customers, competitors, and the communities in which it operates in accordance with universal human rights, and expects reciprocal behavior from all stakeholders.

4.3. Child Labor and Forced Labor

4.3.1. The Company does not tolerate child labor, illegal and/or forced labor, mistreatment of employees, or undeclared employment—any of which violate human rights and legal regulations.

4.4. Violence and Ill-Treatment

4.4.1. The Company is committed to providing all employees with a safe, respectful, and dignified working environment. Employees are strictly prohibited from engaging in or tolerating physical or psychological violence or mistreatment under any circumstances. Even threats, intimidation, or attempts to create fear—without actual physical action—are treated with the same level of seriousness. There is zero tolerance for any form of physical, verbal, sexual, or psychological harassment, abuse, or threat.

4.5. Diversity, Equality, and Inclusion

4.5.1. The Company is committed to providing a workplace where all employees—regardless of their differences—feel fully included and respect one another's rights and dignity. Decisions regarding recruitment, placement, career development, training, compensation, and promotion are based solely on qualifications, performance, skills, and experience.

4.5.2. In all internal and external communications, the Company pays special attention to the principles of diversity, equality, and inclusion, and avoids elements that conflict with core societal values.

4.6. Discrimination

4.6.1. The Company does not tolerate any form of discrimination based on age, gender, race, color, language, religion, philosophical or political views, ethnic origin, economic status, sexual orientation, health status, disability, physical appearance, clothing, or lifestyle. No discriminatory actions, behaviors, or any form of retaliation will be accepted.

4.7. Occupational Health and Safety

4.7.1. Occupational health and safety is one of the Company's top priorities. The Company takes all necessary precautions to minimize health and safety risks in its operations and continuously carries out corrective, preventive, and improvement activities. It complies with all relevant legal regulations and meets necessary requirements. All employees are expected to follow health and safety procedures.

4.8. Freedom of Expression

4.8.1. The Company is committed to preventing any situations that may hinder employees from exercising their right to freedom of expression in the workplace, and it provides environments where employees can express themselves freely.

4.9. Working Hours, Wages, and Employment Rights

4.9.1 The Company establishes competitive wages and employment benefits in accordance with sector dynamics, the local labor market, and the conditions of applicable collective labor agreements. It conducts its operations in full compliance with applicable laws concerning wages, working hours, overtime, and other employment-related benefits. The Company aims to prevent excessive overtime by implementing productivity-enhancing practices during working hours and supports the balance between work and private life.

4.9.2 The Company promotes a productive and motivating workplace environment that supports continuous development. It encourages personal development opportunities, recognizes achievement and exemplary conduct, and supports innovation and creativity through appreciation and reward programs.

ARTICLE 5 – DUTIES AND RESPONSIBILITIES**5.1. Board of Directors**

5.1.1. The Board of Directors is responsible for the creation, implementation, and updating of this Policy. It is also accountable for overseeing the effective functioning of the Ethics Committee and the Internal Audit Department, which are responsible for the notification, investigation, and sanctioning mechanisms related to violations or suspected breaches of the principles and guidelines outlined in this Policy.

5.2. Disciplinary and Ethics Honor Board

5.2.1. The Disciplinary and Ethics Honor Board is responsible for establishing the necessary communication channels to report any violations or suspected breaches of the principles and guidelines stated in the Policy. It also takes the necessary measures to protect the confidentiality and safety of the individuals making such reports.

5.3. Human Resources Department

5.3.1. The Human Resources Department is responsible for ensuring the implementation of the Policy throughout business processes and for conducting activities that increase awareness within the organization.

ARTICLE 6 – COMMUNICATION

6.1. Violations or suspected breaches of the principles and guidelines outlined in this Policy must be reported to the Ethics Committee through the Ethics Line. Provided that the report is made in good faith and not with malicious intent, all necessary measures shall be taken to ensure that the reporting individual is not subjected to any pressure or retaliation. All reports of violations are investigated in accordance with confidentiality principles. If a violation of the Policy is confirmed as a result of the investigation, the responsible individual(s) may be subject to sanctions by the Internal Audit Department in accordance with the principle of equality.

Ethics Line

Email: etikhat@betaenerji.com

Address: Acıdere OSB, Çanakkale Cad. No:11/B, 01350 Hacı Sabancı OSB / Sarıçam / Adana

ARTICLE 7 – ENFORCEMENT

7.1. This Policy was enacted by the decision of the Board of Directors dated April 4, 2025. It shall remain valid and in effect until otherwise announced.

ARTICLE 8 – REVIEW

8.1. This Policy is reviewed annually by the Human Resources Department based on process evaluations or changes in technical infrastructure. The revised and updated version of the Policy is subject to approval by the Board of Directors.

ARTICLE 9 – RELATED POLICIES AND PROCEDURES

Ethical Conduct Policy

Sustainability Policy

Business Ethics and Code of Conduct Procedure

Human Resources Handbook

Occupational Health and Safety Policy