

SUSTAINABILITY POLICIES

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ECZACIBAŞI GROUP

GENDER EQUALITY AND EQUAL OPPORTUNITIES POLICY

1. PURPOSE AND SCOPE

The key to success for the Eczacıbaşı Group¹ is channeling “innovative thinking and creativity” towards the right targets, and this is only possible in an environment where diverse ideas can be represented on different platforms, freely discussed, and put into practice. For the Eczacıbaşı Group, “diversity” is “richness”.

A sustainable future is only possible if women can participate in every area of social life as equals. For this reason, gender equality and equal opportunities are considered to be a top sustainability priority. Eczacıbaşı Group companies’ human resources processes are shaped and guided by a perspective grounded on “providing equal opportunities for everyone”; the Group pledges to give all its employees a fair, equitable and safe working life that respects their dignity.

The Eczacıbaşı Group’s gender equality and equal opportunity practices are primarily shaped by the United Nations (UN) Universal Declaration of Human Rights, the UN Women’s Empowerment Principles (WEPs), and relevant decisions of the International Labor Organization (ILO).

The Group’s sustainability efforts in the field of gender equality and equal opportunities are aligned with the United Nations Sustainable Development Goals, specifically “SDG 5- Gender Equality” and “SDG 8- Decent Work and Economic Growth”.

This Gender Equality and Equal Opportunities Policy (Policy) has been prepared to regulate the general principles and commitments adopted by the Eczacıbaşı Group on gender equality and equal opportunities and covers all Eczacıbaşı Group companies. This Policy is binding for all activities, executives, and employees of the Eczacıbaşı Group. Group companies shall strive to ensure that the principles set out in this Policy are adopted by, and become common practice among, their suppliers and business partners.

2. GENERAL PRINCIPLES AND COMMITMENTS

¹ “Eczacıbaşı Group” or “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

Eczacıbaşı Group companies believe that diversity is an essential component of their corporate culture and, as responsible employers, are committed to offering all employees equal opportunities and impartial treatment. Accordingly, Group companies shall take all necessary measures to ensure equity, diversity and inclusion in their activities and use a variety of mechanisms, such as employee engagement surveys and equal opportunity targets, to monitor and improve their performance in this area.

In line with the above, every Eczacıbaşı Group company shall:

- Not tolerate, under any circumstances, any kind of discriminatory attitude, behavior or practices against an individual based on race, color, language, gender, sexual orientation, marital status, age, religion, philosophical or political opinion, physical qualities or any other visible or invisible attribute.
- Consider equal treatment and equal opportunities for all employees and candidates a fundamental right and support flexible working conditions for employees with different needs.
- Offer every employee equal opportunity in all human resources processes, including performance measurement and evaluation, career planning, performance rewarding and promotion, training-development programs, and dismissal.
- Evaluate the suitability of candidates' qualifications for a position when making decisions on recruitment and promotion, monitor the share of women employees in every step of the process, and when necessary, plan activities aimed at increasing the share of women employees.
- Remunerate all employees doing the same work at the rates set out in the relevant policy (Remuneration Policy). Personal attributes that could lead to gender-based or other forms of discrimination are not considered in determining the initial wage or wage increase for an employee. Remuneration is based on a comprehensive evaluation of the employee, the characteristics of the position, and other objective criteria. Companies shall continually monitor pay data and take corrective measures in the event of a gender gap.
- Ensure balanced gender representation in their governance bodies. They shall offer women every opportunity to have decision-making executive roles at senior levels of their management structure and facilitate this process with development and support programs.
- Implement measures that prevent the use of discriminatory or sexist elements in corporate policy and operational procedural documents, internal and external communication materials, printed and visual media advertisements, advertising and promotional campaign themes and texts, and visual design content. The Eczacıbaşı Group is one of the first members of Unstereotype Alliance Türkiye, a platform that aims to transform harmful gender stereotypes in advertising.
- Pay utmost attention to using egalitarian and inclusive language in all communication. Group companies shall work to increase the awareness of executives and employees in this regard.
- Offer various fringe benefits like daycare support and paid paternity leave to help women and men share responsibilities in their private lives and thus contribute to sustainable development.

- Provide a healthy, peaceful, and safe working environment free from all kinds of mobbing, violence, harassment, pressure, and threats. The mechanisms to be applied in the case of violations are predefined and published in the Eczacıbaşı Group Code of Conduct. Employees involved in any of the above misconduct are treated with zero tolerance and are subject to in-house disciplinary and legal procedures if necessary.
- Work to create opportunities for increasing the employment of women both in value chains and society-at-large, prevent gender-based violence and acts of hatred, and facilitate women's access to education and employment.
- Develop collaborative projects with non-governmental and international organizations active in gender equality.
- Set concrete targets for gender equality and equal opportunities practices and performance and periodically monitor outcomes using objective indicators.

3. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by the Eczacıbaşı Group Gender Equality Committee and Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force with the approval of Eczacıbaşı Holding Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units shall assume responsibility for implementation in their respective areas of responsibility. Monitoring of Policy implementation in Group companies shall be carried out by the Eczacıbaşı Holding ESG Committee and Group companies' Internal Control and Compliance Teams.

4. POLICY REVIEW

This Policy shall be reviewed and assessed on an annual basis by the Eczacıbaşı Group Gender Equality Committee. If there is a significant change in the organization's practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted by the Eczacıbaşı Group Gender Equality Committee and Sustainability, Corporate and Government Affairs when necessary. The changes made in the Policy will enter into force following the approval of the Board of Directors.

5. SUGGESTIONS AND COMPLAINTS

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (Virtual Compliance Officer) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviors and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.

Preparing by	Eczacıbaşı Holding Co. Sustainability, Corporate and Government Affairs Eczacıbaşı Group Gender Equality Committee
Approved by	Board of Directors
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ECZACIBAŞI GROUP

ENVIRONMENT AND CLIMATE CHANGE POLICY

1. PURPOSE AND SCOPE

“Respect for the individual, society and nature” is at the heart of Eczacıbaşı Group's² value creation process. Accordingly, Eczacıbaşı Holding Co. (Eczacıbaşı Holding) and Group companies believe it is their responsibility to support sustainable development and achieve business success through sustainable business models that increase the living standard of society and protect the environment.

Eczacıbaşı Group is a signatory to the United Nations (UN) Global Compact and strives to contribute to the UN Sustainable Development Goals (SDGs). Among the SDGs, the Eczacıbaşı Group's priorities with respect to the environment and climate change are: SDG3-Good Health and Well-Being, SDG6- Clean Water and Sanitation, SDG7-Affordable and Clean Energy, SDG8- Decent Work and Economic Growth, SDG9- Industry, Innovation and Infrastructure, SDG10-

² The “Eczacıbaşı Group” or the “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

Reduced Inequalities, SDG12- Responsible Consumption and Production, SDG13- Climate Action, and SDG17- Partnerships for the Goals.

The purpose of this Environment and Climate Change Policy (Policy) is to define the main principles of the Eczacıbaşı Group's approach to managing environment-related risks and opportunities arising from the Group's activities, products and services, and set out its approach to informing stakeholders. The risk and opportunity topics covered by this policy are energy efficiency; renewable energy use; management of greenhouse gas emissions; water efficiency; circular economy; waste management, recycling and recovery; biodiversity; products and materials with low environmental impact, and access to green financing.

This Policy is binding for all activities and employees of the Eczacıbaşı Group. Group companies also ensure that the principles listed in this Policy are adopted by suppliers, subcontractors and business partners and disseminated throughout their operations.

2. ENVIRONMENTAL AND CLIMATE CHANGE MANAGEMENT PRINCIPLES

The Eczacıbaşı Group encompasses many companies operating in diverse sectors and countries with an expansive ecosystem of suppliers, business partners, and millions of consumers around the world. For this reason, the Eczacıbaşı Group considers environmental and climate change impacts all along the value chain. These impacts can be grouped in three categories:

- Impacts Arising from Supply Chain Processes: Environmental and climate change impacts generated by products and services that Group companies purchase. Supplier operations, product and material preferences play a role in managing these impacts.
- Impacts Arising from Company Operations: Environmental and climate change impacts arising directly from the operations of Group companies.
- Impacts Arising from Products and Services: Environmental and climate change impacts that occur during the sale, consumption and end-of-life processes of goods and services produced by Group companies.

All Eczacıbaşı Group companies are expected to:

- Comply with national and international environment and climate change legislation and other requirements to which they are subject. In matters not covered by laws or regulations,

Group companies are expected to adopt Group standards, internationally accepted principles, and best practices.

- Define their risks and opportunities related to the environment and climate change and apply them to their business strategies.
- Consider environmental impacts and climate change risks while making financial and physical investment decisions and carry out assessment studies accordingly.
- Prioritize the use of technologies that both facilitate the transition to a low carbon economy and take into account the dynamics of the sector in question, and undertake projects that help to combat climate change.
- Consider environmental and climate change impacts while designing plants and processes and choosing production technologies. Companies are expected to try to minimize their impact by implementing the best available techniques and technologies and integrating best practices into their business processes.
- Strive towards increasingly efficient energy use. Companies continually develop and implement projects to reduce energy intensity, losses, and leakages, and set targets for further improvements.
- Diversify their energy sources in light of climate change risks, and encourage the use of renewable energy.
- Aim to keep environmental and climate change impacts under control throughout product life cycles. Companies develop environment-friendly products and strive to improve their performance using the results obtained.
- Focus on reducing water use and water-related risks; increasing wastewater recovery; and taking environmental and social needs into consideration during water withdrawal.
- Identify risks related to soil degradation and take the required preventative measures.
- With a circular economy approach, support efforts to minimize resource use and packaging; use materials with low environmental impact; increase recycling, recovery, and reuse; and design products in accordance with this approach.
- Strive to prevent the generation of waste at its source, in line with the value chain approach. Wastes are reduced, separated, recovered, and, whenever possible, waste is treated as a resource.
- Participate in the efforts of customers in the value chain who want to measure the Group's performance with respect to the environment and climate change or collaborate on projects, and meet their demands accordingly.
- Consider climate change and environmental impacts in purchasing and procurement processes and supplier and raw material preferences. Companies also encourage their suppliers to develop products and practices for managing climate change and environmental risks.
- Monitor and manage operational performance related to the environment and climate change, set targets, and focus on continuous improvement. While setting targets, companies consider the Group's sustainability strategy and roadmap.
- Focus on protecting and improving natural ecosystems and reducing their impact on biodiversity in geographies where they operate.
- Determine noise and air emission risks and take related actions.

- Closely follow national and international developments with respect to the environment and climate change, communicate and collaborate on projects with institutions and organizations, support sectoral and public initiatives.
- Carry out training and communication activities to increase the awareness of employees, external stakeholders and society about the environment and climate change.
- Develop collaboration, joint projects, and studies with relevant stakeholders, especially business partners, suppliers, public institutions, national and international non-governmental organizations, professional associations and committees. Companies encourage business partners to improve their environmental performance.
- Monitor incentives that may be applied to both projects in development and new investments and prioritize green financing.
- Provide incentives for employees and business partners to improve their climate and environmental performance through suggestion and reward systems.

3. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force following the ESG (Environmental, Social, Governance) Committee's favorable review and the Board of Directors' approval.

Top Management of each Group company is responsible for ensuring that the articles of this Policy are implemented in their company; each business unit within the company is responsible for implementation in their own areas of responsibility. Eczacıbaşı Holding's ESG Committee, Eczacıbaşı Holding Sustainability, Corporate and Government Affairs are responsible for monitoring the implementation of this Policy in Group companies.

The Board of Directors of each company may delegate their authority and responsibilities on environmental issues to persons they have authorized within the company in line with the procedures and principles of related legislation. In this case, the Board of Directors provides a high level of supervision and control over the person to whom responsibilities are delegated.

Eczacıbaşı Holding's Audit Group and affiliated internal audit departments also evaluate the implementation of this policy during the periodic audits they carry out in accordance with their annual audit program.

4. POLICY REVIEW

This Policy will be reviewed and evaluated annually by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. If a significant change in Eczacıbaşı Holding's practices affect the Policy, the Sustainability, Corporate and Government Affairs will review and adjust the Policy accordingly. Changes made to the Policy enter into force following the approval of the Board of Directors.

5. SUGGESTIONS AND COMPLAINTS

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (Virtual Compliance Officer) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviors and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.

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ECZACIBAŞI GROUP

ENVIRONMENTAL, SOCIAL, GOVERNANCE POLICY

1. PURPOSE AND SCOPE

Respect for the environment and people is a central Eczacıbaşı Group³ value that reflects the Group's longstanding commitment to serving society. Eczacıbaşı Group companies support sustainable development and strive to achieve business success through sustainable business models because they believe it is their responsibility to increase living standards and protect the environment.

³ The "Eczacıbaşı Group" or the "Group" refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

Eczacıbaşı Group companies support the United Nations Sustainable Development Goals. They monitor and measure the environmental, social, governance (ESG) impact of their activities and services throughout the value chain and make improvements accordingly and ensure the continuity. Through ESG Management, Group companies assess and manage their short, medium and long-term ESG risks and opportunities.

The United Nations (UN) Global Compact, to which the Eczacıbaşı Group is a signatory, and the UN Women's Empowerment Principles (WEPs) and the World Economic Forum's Stakeholder Capitalism Metrics (WEF's Stakeholder Capitalism) are among the international initiatives that shape ESG efforts across the Eczacıbaşı Group.

The purpose of this Environmental, Social, Governance Policy (Policy) is to define the principles that all Group companies shall adhere to in their ESG Management processes. The term ESG Management covers the management of all social, economic, environmental and governance issues; Eczacıbaşı Group companies may also call it “sustainability management.”

The principles in this Policy are binding for all activities and executives of Group companies. Group companies shall comply with the principles outlined in this Policy, implement their own practices and processes as specified, and/or participate in the practices and processes developed and implemented by Eczacıbaşı Holding Co. (Eczacıbaşı Holding).

Group companies shall work with suppliers and business partners who embrace the principles listed in this Policy and help them adopt and disseminate these principles. Purchasing and procurement processes, starting from tenders and through every stage of cooperation with suppliers, shall comply with ESG principles and policies, and the mechanisms for monitoring and measuring compliance shall be clearly stated in contracts.

2. ESG MANAGEMENT

- In accordance with Eczacıbaşı Group operating principles, the activities of all Group companies shall comply fully with national laws and international obligations as defined by inter-state agreements.
- Eczacıbaşı Holding assesses the social, economic, and environmental risks and opportunities of its products and services for its companies, stakeholders, and the socio-economic and natural environment. ESG Policy is developed according to the risks and opportunities. Based on these considerations, the Holding determines its ESG (sustainability) priorities. Group companies may adopt additional priorities that address their own business environment.

- While determining ESG priorities, the Group also takes into account the UN Sustainable Development Goals (SDGs); SDGs related to the Group's ESG priorities are given priority.
- Group companies consider ESG priorities when determining their business strategies, especially strategies related to investment, production, trade, and human resources management.
- The Eczacıbaşı Group evaluates ESG management with targets; it develops plans for achieving targets, and monitors progress with key performance indicators (KPI). It considers the ESG Policy while determining its short- and long-term targets.
- The Eczacıbaşı Group develops internal procedures, and processes in order to ensure the efficiency of ESG management.
- Viewing ESG priorities as areas for continuous improvement, the Eczacıbaşı Group carries out projects aimed at improving the ESG performance of business processes, products, and services.
- The Eczacıbaşı Group considers the expectations and opinions of stakeholders in the planning and execution processes of ESG activities. It establishes systematic tools that facilitate the inclusion of stakeholder views and expectations in management decision-making processes.
- Eczacıbaşı Group aims to increase partnerships and investments within the scope of ESG. In this direction, **it makes an effort to scout and implement** new technologies and supports related initiatives.
- The Eczacıbaşı Group supports the efforts of national and international initiatives and non-governmental organizations to promote sustainable development and monitors developments in the field of sustainability.

3. ECZACIBAŞI GROUP ESG GOVERNING BODIES

The ESG Committee, which reports directly to the Eczacıbaşı Holding Board of Directors, ensures the effectiveness of ESG policies, strategies, governing bodies, and tools applicable throughout the Group, evaluates strategic priorities, and makes recommendations on social, economic and environmental issues. The Sustainability, Corporate and Government Affairs monitors and manages Group-wide sustainability activities.

The organs of the Group's sustainability management structure for field studies are the Sustainability Working Groups established under the Eczacıbaşı Group Sustainability Coordination Committee. The Eczacıbaşı Sustainability Working Groups were formed to transform the Group's sustainability strategies into targets and action plans; to monitor practices emerging from the Group's strategies, policies and goals; and to make recommendations in line with the global agenda. Working Groups are formed based on sub-topics and projects so that committees work efficiently. The Group Sustainability Coordination Committee, which consists of Sustainability Working Group Leaders, monitors the performance obtained in the field studies and reports to Eczacıbaşı Holding Sustainability, Corporate and Government Affairs.

Each Group company can establish a similar management system within its own organization, taking into account its field of activity and scope of operation.

4. ECZACIBAŞI GROUP ESG (SUSTAINABILITY) PRIORITIES

The scope of Eczacıbaşı Group ESG Management consists of ESG priorities resulting from a risk and opportunity-oriented approach that uses the principles and tools recommended by international standards and considers stakeholder expectations and opinions. The Eczacıbaşı Group reviews its ESG priorities every three years. SDGs associated with ESG priorities are also an integral part of ESG management.

The Eczacıbaşı Group's ESG priorities, as determined in its latest review, are listed in Table-1:

Table-1: Eczacıbaşı Group ESG Priorities

Priorities	Related Sustainable Development Goals
Climate and the Environment	SDG3- Good Health and Well-Being
Equal Opportunity, Inclusion and Diversity	SDG4- Quality Education
Occupational Health and Safety	SDG5- Gender Equality
Circular Economy and Recovery	SDG6- Clean Water and Sanitation
Business Ethics and Legal Compliance	SDG7- Affordable and Clean Energy
Product Responsibility	SDG8- Decent Work and Economic Growth
Innovation and Entrepreneurship	SDG9- Industry, Innovation and Infrastructure
Digital Transformation	SDG10- Reduced Inequalities
	SDG12- Responsible Production and Consumption
	SDG13- Climate Action
	SDG17- Partnerships for the Goals

5. REPORTING

The Sustainability, Corporate and Government Affairs presents quarterly reports to the ESG Committee on ESG projects and performance using information provided by Group companies. In addition, each Group company reports directly to Eczacıbaşı Holding's Board of Directors once a year on these issues.

Group companies' performance, goals, and actions with respect to ESG priorities are presented to the public once a year in the form of reports prepared with transparency and objective criteria, in accordance with GRI Standards and other internationally accepted systems and standards, as well as as various assessment frameworks of voluntary initiatives.

6. OTHER RELATED POLICIES

Eczacıbaşı Group has prepared and published policies on several priority ESG issues. These policy documents, which are listed below, are considered to be integral parts of the Group's ESG policy.

- Eczacıbaşı Group Environment and Climate Change Policy
- Eczacıbaşı Group Gender Equality and Diversity Policy
- Eczacıbaşı Group Occupational Health and Safety Policy
- Eczacıbaşı Group Human Rights Policy

7. IMPLEMENTATION RESPONSIBILITY

This policy was prepared by the Sustainability, Corporate and Government Affairs and entered into force with the approval of the ESG Committee and Board of Directors. Senior management of Group companies is responsible for ensuring that policy articles are implemented, and the business units of Group companies are responsible for implementing articles related to their specific areas of responsibility.

Overseeing the implementation of the clauses set out in this Policy in Group companies is the responsibility of the senior management of Group companies. Group companies' business units assume responsibility for implementation in Group companies in their respective areas of responsibility. Eczacıbaşı Holding Sustainability, Corporate and Government Affairs is responsible for ensuring the implementation of this Policy within the Group.

Companies' boards of directors may delegate their authority and responsibilities, which are set out in this Policy, to persons they have authorized within the company according to the procedures and principles of related legislation. In such a case, the Board of Directors provides high-level supervision and oversight of the persons to whom authority and responsibilities are delegated.

Eczacıbaşı Group companies also expect their suppliers and business partners to act in accordance with this policy.

8. POLICY REVIEW

This Policy shall be reviewed and assessed on an annual basis by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. If there is a significant change in practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted by the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. The changes made in the Policy will enter into force following the approval of the Board of Directors.

9. SUGGESTIONS AND COMPLAINTS

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Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.

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Approved by	Board of Directors
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ECZACIBAŞI GROUP HUMAN RIGHTS POLICY

6. PURPOSE AND SCOPE

The Eczacıbaşı Group⁴ ("Group") Human Rights Policy ("Policy") provides guidance to Group companies on the human rights approach and standards they must adhere to in all their activities.

The Human Rights Policy is binding for employees in every Group company and for every activity; all Eczacıbaşı Group companies are responsible for acting in accordance with this Policy. Eczacıbaşı Group companies also expect all business partners to adopt the principles in this Policy and to act in accordance with the Policy to the extent applicable. Group companies strive to disseminate the principles in this Policy by encouraging all relevant business partners to adopt them.

The Policy is based primarily on the policies and principles of international organizations, and national and international human rights legislation. The Group's fundamental human rights principles aim to ensure that employees have a work environment which is peaceful, safe, transparent, equitable, honest, fair and upholds their human dignity. Every human resource process is aligned with ethical principles and human rights, from recruitment to promotion, from development to the determination of remuneration and fringe benefits.

Human rights violations are not tolerated in Eczacıbaşı Group, so Group companies must ensure that they are not taking part in these violations. Child labor and forced labor are strictly prohibited throughout the Eczacıbaşı Group.

Discrimination based on any visible or invisible factors such as race, color, gender, religion, sect, marital status, sexual orientation, sexual identity, philosophical opinion, political opinion or belonging, ethnic identity, health status, family responsibilities, economic situation, union activity or membership, physical disability or age is absolutely unacceptable in all human resources processes and business relationships.

As stated in the Eczacıbaşı Group's Code of Conduct, the Group's management approach is based on respect for people. Human dignity is above all values. The Eczacıbaşı Group embraces the principle of respecting human rights in its relationships with all stakeholders. The Eczacıbaşı Group's human rights approach is based primarily on the regulations listed below:

- ❖ United Nations Universal Declaration of Human Rights
- ❖ United Nations Global Compact (UNGC)
- ❖ Women's Empowerment Principles (WEPs)
- ❖ International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ❖ United Nations Guiding Principles on Business and Human Rights

⁴ The "Eczacıbaşı Group" or the "Group" refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

- ❖ OECD Guidelines for Multinational Enterprises
- ❖ German Supply Chain Due Diligence Act
- ❖ Relevant national and international legislation.

7. GENERAL PRINCIPLES AND COMMITMENTS

The Eczacıbaşı Group respects the rights of everyone directly or indirectly affected by its activities, in particular its employees, shareholders, suppliers, subcontractors, business partners and customers. It takes into account the conditions of disadvantaged groups who are more vulnerable to human rights violations.

Prevention of Child Labor and Forced Labor

Eczacıbaşı Group companies do not accept any form of forced labor. They do not allow any individual to work involuntarily or because of threats. They adopt a zero-tolerance policy against human trafficking and enslavement.

The employment of children under the working age, as determined by laws and internationally accepted norms, negatively affects children's physical and psychological development, leading to the deprivation of their right to education and the abuse of their labor. For this reason, Eczacıbaşı Group companies adopt a zero-tolerance policy against child labor.

The Eczacıbaşı Group prohibits child labor in all its companies in accordance with the child labor principle set out in the "International Labor Organization's Declaration on Fundamental Principles and Rights at Work".

Zero Tolerance for Violence, Discrimination and Harassment

The Eczacıbaşı Group undertakes to create a work environment that is free from all acts of ill treatment, such as physical or psychological violence, bullying, humiliation, discrimination and harassment. Abuse, threats, harassment and bullying of any kind are not tolerated within the Group, nor are situations that threaten peace and security.

Employees are also expected to refrain from discriminatory language and actions and to oppose all kinds of discriminatory behavior.

Equity, Diversity and Inclusion

Diversity and inclusion enriches all institutions. Based on the requirements of employees' jobs, the Eczacıbaşı Group offers equal opportunities to everyone regardless of their national or ethnic origin, social status, health status, disabilities, sexual orientation, age, gender, political view, religion or world view. Group companies prefer that their employees have different cultures and experience backgrounds.

The application of objective criteria in remuneration, an important indicator of equal opportunities, is at the core of the Group's remuneration policies. The Eczacıbaşı Group guarantees that its remuneration policy ensures that there is no discrimination in the wages of employees in similar positions.

Healthy and Safe Working Environment

Providing a healthy and safe work environment is one of the main priorities of all Group companies. Group companies take every necessary measure to protect the health and safety of employees and other people (suppliers, subcontractors, visitors, etc.) on operational sites. They comply fully with national occupational health and safety regulations as well as the principles of the Eczacıbaşı Group Occupational Health and Safety Policy.

Work Conditions

Eczacıbaşı Group companies determine their work conditions in accordance with the legislation, laws and regulations of the country in which they operate. Employees are offered flexible work conditions that take into account the characteristics of their jobs and their personal preferences. Companies comply with local work hours and remuneration policies. Employees are encouraged to take regular leave to focus on their private life and achieve a healthy work-life balance. To ensure fair remuneration, companies consider wage levels in relevant sectors, the state of the local labor market, and the provisions of collective bargaining agreements, if applicable.

Supporting Employee Development

The Eczacıbaşı Group provides comprehensive opportunities for employees to improve their existing knowledge and skills and develop their potential in other fields. Employees are supported by structured internal and external training.

Protection of Privacy

In the Eczacıbaşı Group, the personal information of each employee is protected by high-level data privacy measures. The Group's privacy policy is based on the provisions of relevant legislation. Employees are expected to comply with the data privacy laws of the country of operation and the rules of the Eczacıbaşı Group.

Right of Organization and Collective Bargaining

In the Eczacıbaşı Group, employees' right to unionize and organize is protected, and employees can exercise these rights freely. Unions that act in accordance with legal regulations may organize in Group companies. Group employees can freely join these legal unions and take part in their management without fear of retaliation. Company management is expected to establish constructive relations with legal union representatives freely chosen by employees.

Taking part in Political Activities

Political activism is a constitutional right as well as an internationally recognized human right. Eczacıbaşı Group companies respect the constitutional right of their employees to participate individually and voluntarily in legal political activities. However, employees must carry out these activities outside of work hours and not use Group resources for political activities.

Eczacıbaşı Group companies do not take the side of any political view or ideology. Company resources cannot be used to support political parties and candidates, and promotional and donation activities cannot be used to support a political movement. Political propaganda and party candidates are not allowed on company sites. As stated in the Eczacıbaşı Group's Code of Conduct, under no circumstance can employees play a role in the management of any political party.

8. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by Eczacıbaşı Holding's Human Resources Office and Sustainability, Corporate and Government Affairs, and entered into force with the approval of Eczacıbaşı Holding's Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units assume responsibility for implementation in their respective areas of responsibility. Monitoring of Policy implementation in Group companies is carried out by the Human Resources Office and Human Resources Departments of Group companies.

Eczacıbaşı Group companies carry out their activities in countries where different legal regulations apply. In the case of a discrepancy between this policy and applicable local legislation, the stricter regulation in terms of the protection of human rights shall prevail if permitted by binding local legislation.

Eczacıbaşı Holding's Audit Group and the internal audit units of each company evaluate the implementation status of this policy during the regular audits carried out at certain intervals in line with annual audit plans.

9. POLICY REVIEW

This Policy shall be reviewed and assessed on an annual basis by the Eczacıbaşı Group Human Resources Office and the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. If there is a significant change in the organization's practices that is

likely to affect the Policy, the Policy shall be reviewed and adjusted by both the Eczacıbaşı Group Human Resources Office and the Eczacıbaşı Holding Sustainability, Corporate and Government Affairs. The changes made in the Policy will enter into force following the approval of the Board of Directors.

10. SUGGESTIONS AND COMPLAINTS

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (Virtual Compliance Officer) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviors and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.

Prepared by	Eczacıbaşı Holding Co. Sustainability, Corporate and Government Affairs Human Resources Office
Approved by	Board of Directors
Revision Number	0
Approval Date of Revision	-
Approval Date	03.08.2023

ECZACIBAŞI GROUP OCCUPATIONAL HEALTH AND SAFETY POLICY

11. PURPOSE AND SCOPE

The Eczacıbaşı Group⁵ is committed to treating occupational health and safety (OHS) as a core responsibility. Accordingly, it strives to fulfill its legal and social

⁵ “Eczacıbaşı Group” or “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

responsibilities in this field through the engagement of all relevant parties, including workers, suppliers, contractors, apprentices, and visitors, based on legal regulations and related management system standards.

Every Group company is expected to take preventive action against unsafe behaviors and situations that could lead to work accidents and occupational diseases in order to eliminate or minimize potential hazards.

This Occupational Health and Safety Policy (Policy) has been prepared to regulate the general principles and commitments adopted by the Eczacıbaşı Group on occupational health and safety (OHS) and covers all Eczacıbaşı Group companies.

12. GENERAL PRINCIPLES AND COMMITMENTS

The Eczacıbaşı Group is committed to providing a safe and healthy work environment for its workers and every stakeholder with whom it interacts, to continuously improving its OHS performance, and to complying with all applicable legislation and requirements that its companies are subject to in their respective areas of operations. Aware of its duties towards its employees, society and stakeholders, the Group carries out activities aimed at ensuring a safe and healthy work environment. To this end, Group companies require all stakeholders in the field to comply with health and safety rules and contribute to their improvement.

With the aim of ensuring occupational health and safety rules at all workplaces and operations, all Eczacıbaşı Group companies shall:

- Take measures proactively to eliminate at their source all hazards that may lead to work accidents and occupational diseases.
- Adopt a preventive approach, conduct periodic risk analyses, and assess all available opportunities to plan, implement, develop, and continuously improve OHS measures.
- Undertake to comply with all legal requirements and occupational health and safety obligations.
- Embrace continuous development that considers not only legislative requirements but also technological and sectoral innovations that respond to the expectations of workers and stakeholders.
- Create an environment that engages workers in OHS processes and encourages consultation. Companies shall consult workers and worker representatives at every level of the organization during the planning, implementation, performance assessment and improvement of their OHS management systems.
- Provide all the personal protective equipment needed and make use of safe equipment and appropriate technologies.
- Engage in activities aimed at enhancing the occupational health and safety culture across the Group and within the company.

- Organize training for workers on how to protect themselves against accidents, injuries, diseases and how to use their personal protective equipment properly.
- Monitor workers' health, considering their exposure to health and safety risks at the workplace.
- Ensure the continuity of their occupational health and safety management system while continuously improving it with new technology, best practices from within and without the organization, suggestions and recommendations received from relevant parties/stakeholders, new knowledge and understanding about occupational health and safety, and new skills and competencies.
- Contribute to society's health and safety through the production technologies employed and products created.
- Monitor and prioritize the implementation of certification processes that help to improve occupational health and safety processes.
- Collaborate with external stakeholders to improve their OHS performance.
- Conduct internal control and external audits to improve OHS processes.
- Embrace behavior-oriented occupational health and safety management.
- Set, monitor, and analyze key performance indicators (KPIs).
- Ensure that all workers, contractors, visitors, and apprentices increase their awareness of occupational health and safety through briefings and training.
- Consider and manage OHS risks when planning new investments or changes to existing investments.
- Develop, create, and implement action plans and effective communication for possible emergencies and risks and periodically review their efficiency.
- Monitor suppliers' and contractors' compliance with the principles set out in this Policy.

13. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by the Eczacıbaşı Group Occupational Health & Safety Committee and Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force with the approval of Eczacıbaşı Holding Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units shall assume responsibility for implementation in their respective areas of responsibility. Monitoring of Policy implementation in Group companies is carried out by the Eczacıbaşı Holding ESG Committee and Group companies' Internal Control and Compliance Teams. The Board of Directors of Group companies may delegate their authority and responsibilities on environmental matters to people they have authorized within the company by following the procedures and principles of relevant legislation.

In such a case, the Board of Directors provides high-level supervision and oversight of the persons to whom their authorities and responsibilities are delegated.

14. POLICY REVIEW

This Policy shall be reviewed and assessed on an annual basis. If there is a significant change in the organization's practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted as by Eczacıbaşı Group Occupational Health and Safety Committee and Sustainability, Corporate and Government Affairs as necessary. The changes made in the Policy will enter into force following the approval of the Board of Directors.

15. SUGGESTIONS AND COMPLAINTS

Requests for information, suggestions and complaints regarding this Policy can be shared anonymously through the VCO (Virtual Compliance Officer) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviors and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviors violating the norms of this Policy shall not be exposed to retaliatory behavior and attitudes.

Preparing by	Eczacıbaşı Holding Co. Sustainability, Corporate and Government Affairs Eczacıbaşı Group Occupational Health and Safety Committee
Approved by	Board of Directors
Revision Number	1
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