

## CHILD LABOUR, FORCED LABOUR AND YOUTH EMPLOYMENT POLICY

### 1. PURPOSE AND SCOPE

The purpose of this policy is to clearly and explicitly set out our company's principles, commitments, demands and attitudes on the prevention of child labour, the prevention of forced labour and the support of youth employment.

### 2. DEFINITIONS AND ABBREVIATIONS

- Child labourer: A person who has completed the age of fourteen but not yet fifteen and has completed primary education.
- Young worker A person who has completed the age of fifteen but has not completed the age of eighteen.

### 3. RESPONSIBILITY

The responsibility for the preparation, amendment and supervision of this policy lies with the Ethics Committee, the responsibility for its implementation lies with our company and other companies that are parties to us, and the responsibility for its follow-up lies with the senior management.

The management of the policy is under the responsibility of the Human Resources department.

### 4. POLICY

Our Company develops procedures and practices in Turkey and in all other countries where it conducts business, is represented and manages operations in compliance with all local laws on child labour, forced labour and youth employment, as well as United Nations International Labour Organization (ILO) standards and international agreements in these areas.

In the labour legislation, working conditions of children and young workers are also regulated in order to ensure their health and safety, physical, mental, moral and social development, to continue their education and to prevent economic exploitation.

- Light work, according to its nature and character and according to the special conditions during its performance;
  - Not likely to have a detrimental effect on the development or health and safety of young people,
  - Work that does not interfere with school attendance, vocational training or participation in a training programme approved by the competent authorities and the benefit from such activities.
- The daily working hours of young workers shall be applied in a twenty-four-hour period, taking into account an uninterrupted rest period of fourteen hours.
- If the type of work is classified as "hazardous work", young workers cannot be employed under any circumstances.

- Dangerous work is work in which no one under the age of eighteen can work and which involves the following risks
  - Work where there is a risk of physical, psychological or sexual abuse,
  - Work carried out underground, under water, at dangerous heights or in confined spaces,
  - Work requiring the use of dangerous machinery and vehicles,
  - Work requiring heavy load and material handling,
  - Work exposed to substances that may be hazardous to health,
  - Work exposed to high vibration, heat or noise.
- Forced labour is a situation in which a person is deprived of his/her legal rights and made to work without his/her consent, in return for a penalty, and without being registered. The fact that the person is paid a certain amount does not indicate that the situation is not forced labour.
- Situations that may be examples of forced labour:
  - Bonded labour,
  - Creating situations where the person has no right to refuse to work,
  - It covers situations in which prisoners or convicted persons are employed without special supervision by a public authority, unless otherwise established by a court decision.

The basic principles of our Company's Child Labour, Forced Labour and Youth Employment Policy are stated below:

- Our Company develops practices in Turkey and in all other countries where it conducts business, represents and manages operations in compliance with all local laws on child labour, forced labour and youth employment, as well as United Nations International Labour Organization (UN International Labour Organization-ILO) standards and international agreements in these areas.
- Our company does not allow child labour and forced labour and does not tolerate it in its suppliers.
- Our company permits youth employment on condition that the working hours do not exceed the youth working hours and that the young person works in part- or full-time, light labour jobs that will support the professional development of the young person.
- Young workers or interns working for the company or its suppliers must be registered as required by local law.
- The young worker must be given a break of thirty minutes for work lasting more than two hours and less than four hours, and one hour in the middle of the working period for work lasting between four hours and seven and a half hours.
- All suppliers employing young workers are requested to comply with the standards set out in this policy.
- When practices contrary to the principles and standards of this policy are encountered, the business relationship with the supplier is terminated.

- The Company expects its suppliers to apply the principles and standards of this Policy when selecting and working with their suppliers.

Our company requires its suppliers and subcontractors all over the world to comply with the principles, terms and standards of this policy and to develop procedures in accordance with the policy. Accordingly, all current and future commercial contracts between us and suppliers and subcontractors shall include clauses and commitments regarding the following principles:

- Child labour and forced labour are strictly forbidden and the contract will be terminated in case of detection.
- The supplier or subcontractor undertakes that it understands the principles, standards and conditions of the "Company Child Labour, Forced Labour and Youth Employment Policy" and that it will not employ child labour, will not apply forced labour and will act in accordance with the current national legislation and the principles of this policy in youth employment.
- The supplier or subcontractor undertakes that while producing goods or services for our company, it will not employ child labour, whether or not registered in its own payroll or in the payroll of a supplier or subcontractor, and that young workers will not be employed in jobs classified as hazardous work.
- The supplier or subcontractor undertakes that while producing goods and services for our company, it will not employ, currently or in the future, persons who are or are not registered on its own payroll or on the payroll of a supplier or subcontractor, such as prisoners, victims of human trafficking, or persons who have been subjected to "forced labour" as defined in the Company's Child Labour, Forced Labour and Youth Employment Policy, local and international law.
- The supplier or subcontractor agrees that these commitments are mandatory for the mutual labour contract.
- The supplier or subcontractor agrees to ensure that our company is not damaged by legal liabilities arising from violations of relevant laws and regulations or violations of company principles by suppliers of goods and services and to compensate for possible damages.
- The supplier or subcontractor will be warned by our company in the event that the violation of the relevant laws and regulations or the principles and policies of our company is determined by our company and in this case, it must end the violation in question. Our company may immediately terminate this contract if it determines that the supplier or subcontractor has not terminated the violation.

## **5. AUDIT, REVIEW AND COMPLIANCE**

The audit of compliance with the provisions of this policy is carried out every year within the scope of internal audit. In case of an undesirable notification during the year, the Ethics Committee carries out the necessary work and decides on the relevant notification.

This policy is reviewed by the Ethics Committee once a year from its entry into force in terms of compliance with all local and international laws to which it refers. For other changes and revisions, as a result of the evaluations of the company regarding the relevant risks, the justified change and revision proposal to be prepared by the Ethics Committee is submitted to the senior management and the revised version enters into force upon the approval of the senior management.

Compliance with this policy can be measured and monitored through periodic surveys and audits, compliance assessment and self-assessment tools.

For matters relating to the content or implementation of these policies, contact is made via e-mail [etik@esenbogaelektrik.com.tr](mailto:etik@esenbogaelektrik.com.tr) or by telephone 0 312 467 18 33.

Disciplinary penalties, up to and including termination of the employment contract, may be imposed in accordance with the Disciplinary Regulation for behaviours found to be contrary to the rules of this policy. In case of legal conditions, judicial authorities will be notified.