



# HUMAN RIGHTS POLICY

Version	:	2
Approved By	:	Kordsa Board of Directors
Approval Date	:	23 March 2018
Last Amendment Date	:	10 June 2024

## 1. OBJECTIVE

Kordsa Teknik Tekstil A.Ş. (“Kordsa”) has published this Human Rights Policy (“Policy”) based on the international human rights in accordance with its sustainable development goals. The objective of the Human Rights Policy (“Policy”) is to create a guide that reflects Kordsa and its Group Companies’ approach and standards in relation to Human Rights and shows the importance Kordsa and its Group Companies' attribute to respect for Human Rights. All employees, directors and officers of Kordsa and its Group Companies shall comply with this Policy. This Policy is a component part of Kordsa Code of Business Ethics.

This Policy primarily take into consideration the below mentioned international standards and principles and has been prepared accordingly: Universal Declaration of Human Rights, UN Global Compact, UN Child Rights Convention, Fundamental ILO Conventions, Women’s Empowerment Principles, Worst Forms of Child Labor Convention, OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, international laws and Sabancı Holding Code of Business Ethics .

## 2. SCOPE

This Policy has the characteristics of a guide that needs to be followed by Kordsa and its Group Companies employees in all the countries that Kordsa and its Group Companies conduct their businesses, all persons which provide goods/service to Kordsa and its Group Companies, suppliers, business partners, institutions, establishments and their employees and all stakeholders with which Kordsa and its Group Companies are in a business relationship. The Policy contains the fundamental principles which constitute the essence for the agreements that will be made with these parties. Kordsa expect that these people and its Business Partners comply with and act in line with the principles in this Policy and implement similar policies.

## 3. DEFINITIONS

“Business Partners” include suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.

“Group Companies” means the entities of which Kordsa holds directly or indirectly more than 50% of share capital.

“Human Rights” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free and dignified life, among other Human Rights.

“ILO” means The International Labor Organization

“ILO Declaration on Fundamental Principles and Rights at Work” is an ILO declaration adopted that commits all member states whether or not they have ratified the relevant Conventions, to respect, and promote the following four categories of principles and rights in good faith:

<sup>1</sup> <https://www.sabanci.com/en/management-approach/sabanci-group-code-of-business-ethics>

<sup>2</sup> <https://www.ilo.org/ilo-declaration-fundamental-principles-and-rights-work>

- Freedom of association and effective recognition of collective bargaining,
- Elimination of all forms of forced or compulsory labor,
- Abolition of child labor,
- Elimination of discrimination in employment and occupation.

“Sabancı Group” means Sabancı Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Sabancı Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“OECD” means The Organization for Economic Co-operation and Development

“OECD Guidelines for Multinational Enterprises” aims to develop a state-sponsored corporate responsibility behavior that will maintain the balance between competitors in the international market, and thus, increase the contribution of multinational companies to sustainable development.

“UN” means the United Nations.

“UN Global Compact” is a global pact initiated by the United Nations, to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of Human Rights, labor, the environment and anti-corruption.

“UN Guiding Principles on Business and Human Rights” is a set of guidelines for states and companies to prevent, address and remedy Human Rights abuses committed in business operations.

“Universal Declaration of Human Rights (UDHR)” is a milestone document in the history of Human Rights, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental Human Rights to be universally protected.

“Women’s Empowerment Principles” (WEPs) consists of 7 principles offering guidance to business on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Established by UN Global Compact and UN Gender Equality and Woman Empowerment Unit, the WEPs are based on the recognition that businesses have a role and responsibility in promoting gender equality and empowering women, in accordance with international labor and human rights standards.

“Worst Forms of Child Labor Convention (Convention No. 182)” means the ILO Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labor.

#### **4. FUNDAMENTAL PRINCIPLES, COMMITMENT AND IMPLEMENTATION**

As a Sabancı Group company, Kordsa and its Group Companies undertakes to operate in compliance with the Universal Declaration of Human Rights, UN Global Compact, UN Child Rights Convention, Fundamental ILO Conventions, Womens’s Empowerment Principles, Worst Forms of Child Labor Convention, OECD Guidelines for Multinational Enterprises, UN Guiding

<sup>3</sup> <https://mneguidelines.oecd.org/annualreportsontheguidelines.htm>

<sup>4</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>5</sup>[https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>6</sup><https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<sup>7</sup><https://www.weps.org/about>

<sup>8</sup>[https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

Principles on Business and Human Rights. Kordsa and its Group Companies are committed to show respect towards the universal human rights in all the countries it operates and in all business activities and to look after all Kordsa employee rights by adopting the national and international declarations, fundamentals, conventions and principles. In this respect, Kordsa and Group companies have zero-tolerance to forced labor, child labor, all forms of discrimination and harassment.

With the objective of supporting and implementing the Policy, Kordsa has been developing supportive working methods in order not to participate in businesses which abuse human rights directly or indirectly.

In this regard, in accordance with Sabancı Holding Code of Business Ethics and Kordsa Code of Business Ethics, Kordsa and its Group Companies are committed;

### **Diversity, Inclusion, Equal Opportunity**

- To showing equal treatment without making any discrimination of religion, language, ethnicity, race, belief, sect, skin color, nationality or social origin, age, sexual orientation, gender, civil status, political view, union membership, disadvantages and based on all legally protected characteristics in our relationships with our Business Partners and stakeholders, or in processes such as recruitment, dismissal, training, career development, promotion, performance evaluation, discipline, compensation, and social benefits.

- Our Business Partners are committed to supporting a safe working environment free from any form of harassment, abuse, exploitation, intimidation, or physical, verbal, sexual, digital, or psychological violence, and to taking all necessary measures in this regard.

### **Working Conditions, Salary System and Benefits**

- To working in compliance with the working hours and overtime standards determined by applicable laws and regulations in all countries where Kordsa and its Group Companies operate, and to establish contractual relationships with our subcontractors and Business Partners accordingly. Kordsa and its Group Companies expect their Business Partners to comply with the provisions of this Policy and to comply with the laws and regulations regarding working conditions, compensation, and benefits (such as mandatory minimum wage) in the countries where Kordsa and its Group Companies operate.

### **Occupational Health & Safety and Environmental Respect**

- To providing safe and healthy working environments for all business partners as well as for employees in line with the goal of "zero accident", which is the basis of the understanding of occupational health and safety, in all countries and workplaces of operations and to take the necessary precautions in this regard and develop regulations in accordance with the Occupational Health and Safety Legislations,

- To ensuring that investment projects are reviewed in terms of environmental impacts in accordance with international legislation, within the framework of sustainable growth targets and legal responsibilities towards society and the environment,

### **Zero Tolerance to Child and Forced Labor**

- To developing procedures for Business Partners to make sure that they are staying away from all kinds of forced and compulsory labor and child labor practices, including modern slavery, debt labor and human trafficking, and to work to evaluate the performance of service parties within the scope of Kordsa commitments to international organizations,
- Kordsa and Group Companies strongly oppose all forms of labor exploitation, including child labor, forced or compulsory labor, any form of abuse, or mental or physical threats, both among their own employees and those employed within their supply chain. Kordsa and its Group Companies condemn all forms of human trafficking and exploitation.
- Pursuant to Conventions and Recommendations of the ILO, the Universal Declaration of Human Rights, and the UN Global Compact, Kordsa and its Group Companies have a zero-tolerance policy towards slavery and human trafficking and expects all its Business Partners to act accordingly.

### **Prevention of Harassment and Zero Tolerance Principle**

- Kordsa and its Group Companies are committed to ensuring a safe workplace environment for all employees where there is zero-tolerance environment for discrimination and/or violence arising from any form of harassment, including sexual harassment.
- Sexual harassment is any unwanted behavior of a sexual or otherwise that causes a person to feel humiliated and/or intimidated, and/or uncomfortable. The behavior may be exhibited as a condition of the person's employment or may create a hostile, intimidating, or humiliating environment for the person subjected to it.

Different types of sexual or other harassment may involve one or more incidents, and the conduct constituting harassment may be physical, verbal, or non-verbal.

Everyone who experiences or witnesses a harassment incident (even if it does not escalate to physical violence or harassment) knows that it is an unwanted behaviour by Kordsa and its Group Companies and that it constitutes a violation of this Policy. Each Kordsa and its Group Company acknowledges that harassment can occur in unequal relationships (i.e. between a manager and his/her team member) and that the victim may be reluctant/hesitant to report the alleged harasser. Therefore, Each Kordsa and its Group Company reminds the victim that it stands by him/her and that if he/she decides to report, the company will support him/her and he/she will not suffer any consequences such as loss of job, etc.

If employees or other stakeholders become aware of an ethical breach that may constitute a violation of this Policy, they should use the complaint mechanism provided under this Policy.

The person or organisation receiving the harassment complaint:

- Immediately records the date and time of the incident(s).
- Ensures that the victim understands the company's procedures for handling complaints.
- Keeps all discussions confidential.
- Respects the victim's choice to resolve the incident through company procedures and/or legal means.

Kordsa and its Group Companies explicitly state that the internal investigation process does not prevent the victim from exercising his/her legal rights.

Kordsa and its Group Companies are obliged to establish, operate and make their complaint mechanism transparent and accessible to stakeholders, with the minimum requirements as described above.

Kordsa and its Group Companies shall include policies aimed at preventing harassment in their Gender Equality Programmes, which shall be made available to all employees throughout the organisation without exception.

### **Complaint Mechanisms**

Kordsa and its Group companies are committed to monitoring and ensuring compliance with international and national human rights legislation in their supply chain practices through contractual arrangements with suppliers, and to continue to use independently managed whistleblowing/complaint hotline mechanisms where both employees and business partners can anonymously report concerns/complaints.

### **Freedom of Unionization**

To respecting the freedom of unionization, freedom of speech and collective bargaining in accordance with the legislation of all countries where Kordsa employees are working, and not to make pressure or discrimination on employees using these rights in any way.

### **Data Privacy**

To implementing high-level data privacy standards for the protection of personal data of employees, Business Partners and stakeholders and complying with national and international regulations and data protection authorities' decisions.

## **5. EXPECTATIONS FROM STAKEHOLDERS**

All Business Partners and stakeholders, including persons and institutions acting on behalf of Kordsa and its Group Companies, are expected to comply with the Policy.

In this context, the agreements made with all business partners include provisions regarding full compliance with the principles in this Policy, and the employees of business partners absorbing these principles and acting accordingly.

Kordsa and its Group Companies establish whistleblowing/hotline mechanism, in order to maintain compliance with this Policy and to further improve the implementation of this Policy, follow up the possible violations and suspicious situations. Kordsa and its Group Companies make efforts to evaluate the business processes of the relevant parties within the scope of its commitments to international organizations in terms of human rights.

## **6. COMPLIANCE, SURVEILLANCE, AUDITS AND REPORTING**

All employees and directors of Kordsa and its Group Companies are responsible for complying with this Policy, implementing and supporting the relevant Kordsa and its Group Companies' procedures and controls in accordance with the requirements in this Policy. In this regard, Kordsa and its Group companies shall endeavour to monitor compliance with this policy and carry out impact assessments. In case of non-compliance with this Policy and other relevant rules, Kordsa Board of Directors is responsible for the surveillance of identification and management of notification, inspection and sanction mechanisms. The implementation responsibility of this Policy belongs to CEO and Board of Directors.

In the event of detection of situations and inappropriate behavior in contradiction with this Policy, penal sanctions may be applied in accordance with the provisions of the relevant legislation in the countries in which we operate. If there is a discrepancy between the local regulations applicable in the countries where Kordsa and its Group Companies operate, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersede.

Feedback regarding the Policy and any potential Policy violations or non-compliances, or situations suspected of being contrary to legal regulations, can be reported through Kordsa Ethics Hotline operated by an independent third-party company (Navex Global). Ethics and legal violations can be reported to the Kordsa Ethics Hotline via telephone and web page, and employees can also directly share unethical and inappropriate behaviors with their managers or Global/Local Ethics Compliance Officer, or Head of Legal and Compliance. Kordsa Ethics Hotline is a confidential and secure line that can be used for both internal and external reporting. Below are the relevant toll-free phone numbers and web addresses for this purpose:

<b>Ethics Hotline</b>																
<b>Online</b>	:	kordsa.ethicspoint.com (desktop version) kordsa-mobile.ethicspoint.com (mobile version)														
<b>Toll-Free Phone Numbers by Country</b>	:	<table style="width: 100%; border: none;"> <tr> <td style="width: 40%;">Indonesia</td> <td style="width: 60%;">0800-140-1916</td> </tr> <tr> <td>Thailand</td> <td>1800-014-755</td> </tr> <tr> <td>Türkiye</td> <td>0800-621-2461</td> </tr> <tr> <td>USA</td> <td>800-725-927</td> </tr> <tr> <td>Brazil</td> <td>0800-000-0551</td> </tr> <tr> <td>Italy</td> <td>800-725-927</td> </tr> <tr> <td>Germany</td> <td>0800 1822656</td> </tr> </table>	Indonesia	0800-140-1916	Thailand	1800-014-755	Türkiye	0800-621-2461	USA	800-725-927	Brazil	0800-000-0551	Italy	800-725-927	Germany	0800 1822656
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Italy	800-725-927															
Germany	0800 1822656															
<b>Ethics Board</b>																
<b>E-mail</b>	:	<a href="mailto:etik@kordsa.com">etik@kordsa.com</a>														
<b>Address</b>	:	Kordsa Teknik Tekstil A.S. Kordsa Ethics Board Sanayi Mah. Teknopark Bulvarı No:1/1B PK 34906 Kurtköy Pendik / İstanbul, Türkiye														
<b>Phone</b>	:	(+90) 216 300 10 00 <i>Work hours:</i> <i>Weekdays 08:00-12:00 am and 01:00-05:30 pm</i> <i>Turkish Time (GMT +2)</i>														
<b>Global Ethics Compliance Officer</b>																
<b>E-mail</b>	:	<a href="mailto:etik@kordsa.com">etik@kordsa.com</a>														
<b>Address</b>	:	Kordsa Teknik Tekstil A.S. Global Ethics Compliance Officer Sanayi Mah. Teknopark Bulvarı No:1/1B PK 34906 Kurtköy Pendik / İstanbul, Türkiye														
<b>Phone</b>	:	(+90) 216 300 10 00														
<b>Local Ethics Compliance Officer / Izmit</b>																



<b>E-mail</b>	:	<a href="mailto:etik.tr@kordsa.com">etik.tr@kordsa.com</a>
<b>Address</b>	:	Kordsa Teknik Tekstil A.S. Ethics Compliance Officer Tr. P.K. 196 41001 Alikahya İzmit-Kocaeli, Türkiye
<b>Phone</b>	:	(+90) 262 316 79 99
<b>Local Ethics Compliance Officer / USA / Pennsylvania Fabric Development, Inc.</b>		
<b>E-mail</b>	:	<a href="mailto:ethics@fabricdevelopment.com">ethics@fabricdevelopment.com</a>
<b>Address</b>	:	Fabric Development, Inc. 1217 Mill Street, Quakertown, Bucks Country PA 18951, USA
<b>Phone</b>	:	+1 (267-424-9400)
<b>Local Ethics Compliance Officer / USA / California Axiom Materials Inc.</b>		
<b>E-mail</b>	:	<a href="mailto:ethics@axiommaterials.com">ethics@axiommaterials.com</a>
<b>Address</b>	:	Axiom Materials Acquisition LLC 2320 Pullman St.Santa Ana, CA 92705 USA
<b>Phone</b>	:	(+1) 949-755-0346
<b>Local Ethics Compliance Officer / USA / California Textile Products, Inc.</b>		
<b>E-mail</b>	:	<a href="mailto:ethics@textileproducts.com">ethics@textileproducts.com</a>
<b>Address</b>	:	Textile Products, Inc. 2512 W Woodland Dr, Anaheim, CA 92801, USA
<b>Phone</b>	:	(+1) 714-822-0005
<b>Local Ethics Compliance Officer / USA / Chattanooga</b>		
<b>E-mail</b>	:	<a href="mailto:chattethics@kordsa.com">chattethics@kordsa.com</a>

<b>Address</b>	:	Kordsa, Inc. Ethics Compliance Officer 4501 North Access Road Chattanooga TN 37415-9990, USA
<b>Phone</b>	:	(+1) 866 421 2777
<b>Local Ethics Compliance Officer / USA / Laurel Hill</b>		
<b>E-mail</b>	:	<a href="mailto:laurelhillethics@kordsa.com">laurelhillethics@kordsa.com</a>
<b>Address</b>	:	Kordsa, Inc. Ethics Compliance Officer 17780 Armstrong Road Laurel Hill NC 28351, USA
<b>Phone</b>	:	(+1) 866 421 2777
<b>Local Ethics Compliance Officer / Brasil</b>		
<b>E-mail</b>	:	<a href="mailto:etica.brasil@kordsa.com">etica.brasil@kordsa.com</a>
<b>Address</b>	:	Kordsa Brasil S.A. Ethics Compliance Officer Rua Eteno, nº 3832 Polo Industrial de Camaçari Camaçari, BA, Brazil
<b>Phone</b>	:	(+55) 71 2104 4601
<b>Local Ethics Compliance Officer / Indonesia</b>		
<b>E-mail</b>	:	<a href="mailto:etika@kordsa.com">etika@kordsa.com</a>
<b>Address</b>	:	PT Indo Kordsa Tbk Ethics Compliance Officer Jl. Pahlawan, Desa Karang Asem Timur, Citeureup Bogor 16810 Indonesia

<b>Phone</b>	:	(+62) 21 875 39 36
<b>Local Ethics Compliance Officer / Thailand</b>		
<b>E-mail</b>	:	<a href="mailto:etik.th@kordsa.com">etik.th@kordsa.com</a>
<b>Address</b>	:	Thai Indo Kordsa Co., Ltd. Ethics Compliance Officer Rojana Industrial Park, 1/61 Moo 5 Khanham Subdistrict Uthai District, Ayutthaya 13210, Thailand
<b>Phone</b>	:	(+66) 35 330221-9/ext.331
<b>Sabancı Holding Ethics Board</b>		
<b>E-mail</b>	:	<a href="mailto:etik@sabanci.com">etik@sabanci.com</a>
<b>Address</b>	:	H.Ö. Sabancı Holding AS Attn: Ethics Board Sabancı Center 34330, 4.Levent Istanbul Türkiye
<b>Phone</b>	:	+90 212 385 85 85

Violation of this Policy by any employee of Kordsa and its Group Companies may result in significant disciplinary actions including dismissal. If any third party expected to comply with this Policy violates it, whether identified through the Reporting process or by other means, Kordsa will take appropriate actions in accordance with relevant legal, regulatory, contractual, and disciplinary systems, depending on the severity of the incident.

## 7. EFFECTIVE DATE AND CONDITION

Human Rights Policy has entered into force with the Board of Directors decision dated 23/03/2018 and has been revised as per the Board of Directors decision dated 10/06/2024. The Policy, if necessary and in any event biyearly, is revised by Ethics Board and the possible amendments are made by the Board of Directors decision. The coordination of Policy is under the responsibility of Legal and Compliance Department. In addition to this, all Kordsa directors are responsible for managing the business processes in respective administrative and commercial functions in compliance with the Policy.

**10 June 2024**