

**Setur Marinas**

**Human Rights Policy**

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## 1. PURPOSE AND SCOPE

The purpose of this Human Rights Policy (“**Policy**”) is to establish a guide reflecting Setur Marinas’ approach and standards regarding human rights and thereby emphasize the importance that Setur Marinas attaches to human rights.

All employees and managers of Setur Marinas are obliged to act in accordance with this Policy. Each Setur Marinas company expects all Business Partners to act in compliance with this Policy to the extent applicable to the relevant party and/or transaction and takes the necessary steps to ensure such compliance.

## 2. DEFINITIONS

“**Business Partners**” include suppliers, all representatives acting on behalf of the company, subcontractors and consultants.

“**Human Rights**” refers to the rights inherent to all human beings regardless of gender, race, color, religion, language, age, nationality, differences of opinion and differences in wealth, and includes the right to live a life of equality, freedom and dignity.

“**ILO**” refers to the International Labour Organization.

“**ILO Declaration on Fundamental Principles and Rights at Work**”<sup>1</sup> refers to the ILO Declaration stating that all member countries, even if they have not ratified the relevant conventions, are obliged in good faith to respect, promote and realize the following four principles:

- Freedom of association and the effective recognition of the right to collective bargaining,
- The elimination of all forms of forced or compulsory labour,
- The abolition of child labour,
- The elimination of discrimination in respect of employment and occupation.

“**Koç Group**” refers to Koç Holding A.Ş., all companies directly or indirectly controlled by Koç Holding A.Ş., individually or jointly, and the joint ventures included in the consolidated financial report of Koç Holding A.Ş.

“**OECD**” refers to the Organisation for Economic Co-operation and Development.

“**OECD Guidelines for Multinational Enterprises**” refers to the OECD guideline aimed at developing a state-supported corporate responsibility behavior that will maintain balance among competitors in the international market and thereby increase the contribution of multinational enterprises to sustainable development.

“**Setur Marinas**” refers to Tek-Art Kalamış ve Fenerbahçe Marmara Turizm Tesisleri A.Ş. and its affiliated branches (marinas), its subsidiaries including Demre Marina İşletmeciliği A.Ş., Setur Yalova Marina İşletmeciliği A.Ş., Ayvalık Marina ve Yat İşletmeciliği Sanayi Ticaret A.Ş., Setur Antalya Marina İşletmeciliği A.Ş., Makmarin Kaş Marina İşletmeciliği Turizm ve Ticaret A.Ş., as

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<sup>1</sup> <https://www.ilo.org/declaration/lang--en/index.htm>

well as all companies directly or indirectly controlled individually or jointly by these companies and the joint ventures included in their consolidated financial reports. Any new marina branches and companies that may be directly or indirectly controlled by the above-mentioned companies during the period this Policy remains in effect shall also fall under the definition of “Setur Marinas”.

“UN” refers to the United Nations international organization.

“**Universal Declaration of Human Rights**” is a landmark document in the history of human rights. Prepared by representatives with different legal and cultural backgrounds from all regions of the world, this Declaration was proclaimed by the UN General Assembly in Paris on 10 December 1948 as a common standard of achievement for all peoples and all nations and is the first document emphasizing the universal protection of fundamental human rights.

“**UN Global Compact**<sup>2</sup>” refers to the agreement based on universally accepted UN declarations regarding social responsibility and sustainability practices, addressing the ten fundamental responsibility areas of the business world in the fields of human rights, labor standards, environment and anti-corruption.

“**UN Guiding Principles on Business and Human Rights**”<sup>3</sup> refers to a guideline document prepared for countries and companies in order to examine, prevent and remedy human rights violations encountered in business life.

“**Women’s Empowerment Principles (WEPs)**” refers to a set of principles that provide guidance to the business world on how to promote gender equality and women’s empowerment in the workplace, marketplace and community. Developed by the UN Global Compact and UN Women, these principles are based on the recognition that businesses have a role and responsibility in promoting gender equality and women’s empowerment in line with international labor and human rights standards.

“**Worst Forms of Child Labour Convention (Convention No. 182)**”<sup>4</sup> refers to the ILO convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour.

### 3. GENERAL PRINCIPLES

Setur Marinas takes the Universal Declaration of Human Rights as a guide and adopts an approach that respects human rights toward its stakeholders in the societies where it operates. Creating and maintaining a positive and professional working environment for its employees is a fundamental principle of Setur Marinas. Setur Marinas acts in accordance with global ethical principles in matters such as recruitment, promotion, career development, wages, benefits and diversity, and respects the rights of its employees to establish and join civil society organizations of their own choice. Setur

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<sup>2</sup> <https://www.unglobalcompact.org/what-is-gc/mission/principles>

<sup>3</sup> [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>4</sup> [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

Marinas shows zero tolerance for forced labor, child labor, any form of discrimination and harassment.

With respect to human rights, Setur Marinas primarily takes into consideration the following international standards and principles:

- UN Guiding Principles on Business and Human Rights (2011)
- UN Global Compact (2000)
- ILO Declaration on Fundamental Principles and Rights at Work (1998)
- Women's Empowerment Principles (2011)
- Worst Forms of Child Labour Convention (No. 182)
- OECD Guidelines for Multinational Enterprises (2011)

#### **4. COMMITMENTS**

Setur Marinas strives to respect the rights of its employees, shareholders, Business Partners, customers and all others who may be affected by its products or services in connection with its activities by fulfilling the principles of the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

Setur Marinas treats all employees honestly and fairly and assumes the responsibility of providing a safe and healthy working environment that respects human dignity and avoids discrimination.

Setur Marinas may also implement additional standards for disadvantaged groups who are more likely to be exposed to human rights violations. As stated in the UN Guiding Principles on Business and Human Rights, Setur Marinas takes into account the special circumstances of groups whose rights are described in more detail in United Nations documents (indigenous peoples; women; ethnic, religious and linguistic minorities; children; persons with disabilities; migrant workers and their families).

##### **Diversity and Equal Employment Opportunities**

Setur Marinas strives to employ individuals from different cultures, experiences and backgrounds. Recruitment decisions are based solely on job requirements and personal qualifications, regardless of race, religion, nationality, gender, age, marital status or disability.

##### **Prevention of Discrimination**

A zero-tolerance policy against discrimination is a fundamental principle in all recruitment, promotion, appointment and training processes. Setur Marinas expects all employees to act with the same sensitivity in their interactions with each other.

Setur Marinas endeavors to treat employees equally by providing equal rights and opportunities. No form of discrimination or disrespect based on race, gender, color, nationality, religion, age, disability, sexual orientation or political opinion is tolerated.

## **Zero Tolerance for Child Labour and Forced Labour**

Setur Marinas strongly opposes child labor that causes physical or psychological harm to children and deprives them of their right to education. In addition, Setur Marinas opposes all forms of forced labor defined as work performed involuntarily and under threat.

In line with ILO conventions and recommendations, the Universal Declaration of Human Rights and the UN Global Compact, Setur Marinas implements a zero-tolerance policy against slavery and human trafficking and expects all Business Partners to act accordingly.

## **Freedom of Association and Collective Bargaining**

Setur Marinas respects the rights of its employees to join a union and to engage in collective bargaining without fear of retaliation. Setur Marinas undertakes to establish constructive dialogue with the freely elected representatives of its employees who are represented by a legally recognized union.

## **Health and Safety**

Protecting the health and safety of employees and other individuals who may be present in Setur Marinas' workplaces for any reason is one of Setur Marinas' highest priorities. Setur Marinas companies provide a safe and healthy working environment. Security services, when required, are provided in a manner that respects the dignity, privacy and reputation of each individual. Setur Marinas complies with the applicable legislation and implements the necessary safety measures in all workplaces.

In the event that unsafe conditions or behaviors are identified in the workplace, Setur Marinas immediately takes the necessary measures to ensure the health, safety and security of customers and employees.

## **Zero Tolerance for Harassment and Violence**

An important way to protect the personal dignity of employees is to take the necessary measures to prevent harassment and violence and to apply appropriate sanctions if such incidents occur. Setur Marinas is committed to providing a working environment in which violence and harassment are not tolerated and where there are no conditions that threaten safety or create discomfort. Therefore, Setur Marinas does not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threat.

## **Working Hours and Wages**

Setur Marinas complies with the local legal working hours in the countries where it operates in order not to exceed the maximum weekly working hours. Great importance is attached to ensuring that employees take regular breaks and leave and maintain a productive work-life balance.

The wage determination process is established in a competitive manner in accordance with the relevant sectors and local labor markets and, where applicable, in accordance with the provisions of collective bargaining agreements. All wages, including social benefits, are paid in accordance with applicable laws and regulations.

Setur Marinas employees may contact the Setur Marinas Legal and Compliance Manager for additional information regarding the legislation governing working conditions in the countries where they are employed.

### **Personal Development**

Setur Marinas provides opportunities for its employees to develop their skills and potential. Considering human capital as a valuable resource, Setur Marinas supports its employees through internal and external training and strives to contribute to their comprehensive personal development.

### **Data Privacy**

Setur Marinas applies high-level data privacy standards to protect the personal information of its employees. Data privacy standards are implemented in compliance with the relevant legislation.

Setur Marinas expects its employees to comply with the applicable data privacy laws in every country in which it operates.

### **Political Activities**

Setur Marinas respects all lawful and voluntary political participation of its employees. However, employees must carry out their political activities outside working hours and should refrain from using Setur Marinas resources for such activities.

## **5. AUTHORITY AND RESPONSIBILITIES**

All employees and managers of Setur Marinas are responsible for complying with this Policy and for implementing and supporting the relevant procedures and controls of the relevant Setur Marinas company in line with the requirements set forth in this Policy. Each Setur Marinas company expects all Business Partners to act in compliance with this Policy to the extent applicable to the relevant party and/or transaction and takes the necessary steps to ensure such compliance.

In the event of any discrepancy between this Policy and the local legislation applicable in the countries where Setur Marinas operates, the more restrictive provision between the Policy and the legislation shall prevail, provided that the relevant practice does not constitute a violation of local legislation.

If you become aware of any action that you believe is contrary to this Policy, the applicable legislation, the Koç Group Code of Ethics or the Setur Marinas Code of Ethics, you may consult with or report the matter to your immediate supervisor. Alternatively, you may submit a report through the Ethics Line at “koc.com.tr/hotline”.

Setur Marinas employees may consult the Setur Marinas Human Resources Department regarding any questions about this Policy and its implementation. A violation of this Policy by an employee may result in significant disciplinary actions, including termination of employment. If any third party expected to comply with this Policy acts in violation of it, the relevant contracts may be terminated.

**6. REVISION HISTORY**

This Policy, adopted by Setur Marinas, entered into force with the approval of the Board of Directors on 31.01.2023, and the Human Resources Department of Setur Marinas is responsible for updating the Policy.

<b>Revision</b>	<b>Date</b>	<b>Comment</b>
No:1	13.05.2024	The alphabetical order of definitions has been corrected.