



KOLUMAN
HUMAN RIGHTS
POLICY



1. Purpose

At Koluman Holding, we regard respect for human rights as the cornerstone of our corporate values. We believe that acting with an ethical and responsible approach in the business world is a critical factor not only for the sustainable success of our company but also for the welfare of society. We commit to full compliance with human rights legislation, international conventions and ethical principles applicable in the countries where we operate in all our business processes.

Our human rights policy has been developed in line with international standards, including the United Nations Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, and the OECD Guidelines for Multinational Enterprises.

2. Culture of Adaptation and Fundamental Principles

This policy applies to all subsidiaries, business partners, suppliers, subcontractors and employees of Koluman Holding, covering all business processes directly and indirectly affected by our company.

Accordingly, all our managers and employees are obliged to respect human rights. We also expect our business partners, suppliers and all stakeholders to comply with this policy.

3. Our Core Principles

3.1. Prevention of Discrimination and Promotion of Diversity

Koluman Holding categorically rejects discrimination on the basis of race, gender, age, religion, ethnic origin, nationality, language, disability status, sexual orientation, marital status, political views or any other personal characteristic.

- We support equal opportunities for our employees and business partners.
- We promote inclusivity in our working environment and draw strength from diversity.
- We manage all recruitment, promotion and remuneration processes based on fair, transparent and objective criteria.

3.2. Prevention of Forced Labour and Child Labour

Koluman Holding has adopted a zero-tolerance policy towards all forms of forced labour, modern slavery and human trafficking.

- We do not subject any of our employees to physical, mental or economic pressure.
- We absolutely do not accept child labour and strictly adhere to this principle throughout our supply chain.
- We expect our business partners to develop policies against child labour and forced labour.

3.3. Fair and Safe Working Conditions

It is our responsibility to ensure that all our employees have a healthy, safe and respectful working environment.

- We provide safe working conditions that protect the physical and mental health of our employees.
- We continuously improve our occupational health and safety policies, prioritising the well-being of our employees.
- We set working hours in accordance with legal regulations and implement fair and competitive remuneration policies.

3.4. Prevention of Harassment and Bullying in the Workplace

At Koluman Holding, ensuring that our employees work in a safe and respectful environment is one of our top priorities.

- We absolutely reject any behaviour involving sexual harassment, bullying, mobbing or physical/psychological violence.
- We establish secure complaint mechanisms against such violations and protect those who report them from retaliation.
- We provide regular training to raise awareness among all our employees and managers on this issue.

3.4. Environmental and Social Responsibility

We embrace respect for human rights as a fundamental principle not only for our employees, but also for the society and environment in which we operate.

- We use natural resources efficiently and view environmental sustainability as an integral part of our business strategy.
- We support social responsibility projects that add value to society.
- We avoid activities in our business processes that could harm human rights.

4. Implementation and Responsibilities

Koluman Holding expects all our managers and employees to fully comply with these principles to ensure the effective implementation of our human rights policy.

Managers are responsible for ensuring a working environment that respects human rights.

Employees must demonstrate respect for human rights and report any situations that violate the policy.

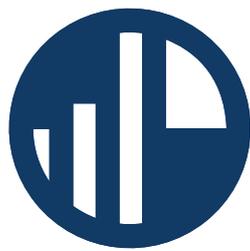
Business partners and suppliers must act in accordance with Koluman Holding's human rights policy.

In the event of violations, our employees and business partners may report them through reporting mechanisms established on the basis of confidentiality. All complaints and reports will be evaluated independently, impartially and fairly, and necessary actions will be taken.

Koluman Holding considers respect for human rights to be an integral part of our corporate culture and is committed to adhering to these principles in all business processes. We expect our employees, business partners and all stakeholders to act in accordance with these values. By creating a working environment that supports human rights, we will continue to develop a responsible and sustainable business model.

5. Validity and Updates

Date of First Publication	Revision Date/No.	Explanation
08.04.2025	-	-



Compliance Programme

