

## SOCIAL COMPLIANCE POLICY

Our Social Compliance Policy includes the standards we have established in cooperation with all our business partners, based on our core principles and values, through teamwork.

Our goal is to ensure that the Social Compliance Policy becomes a part of our company culture. Therefore, social compliance standards have been created and implemented.

In addition to creating products and services, this policy ensures that all employee rights arising from standards within the framework of laws are granted, occupational health and safety rules are followed, environmental sensitivity is maintained, and an open and honest communication, respect, and a valued workplace environment are established among employees.

The Social Compliance Policy is communicated to all our employees through training or communication channels (such as bulletin boards, website, email groups, etc.), and suppliers are informed and evaluated based on these criteria.

Under this policy, no punitive or disciplinary actions are taken against employees who express their concerns, anxieties, or complaints. Suggestion, request, and complaint boxes are provided to allow employees to voice their concerns. Employees can freely express any opinions, requests, complaints, and suggestions in these boxes, and these are evaluated by Senior Management. Necessary improvement actions are taken for areas that require enhancement.

*The Social Compliance Policy covers the following components:*

- 1. Forced Labor (Voluntary Work)*
- 2. Child Labor (Underage Employees)*
- 3. Discrimination (Equitable Approach)*
- 4. Ethical Business Conduct*
- 5. Working Hours and Wages (Salary/Wages)*
- 6. Health and Safety*
- 7. Commitment to Community and Stakeholders*
- 8. Foreign Workers*
- 9. Rest Days and Holidays*
- 10. Recruitment and Employment*
- 11. Employment Contract (Employer Contract)*
- 12. Labor and Workplace Discipline*
- 13. Freedom of Association and Collective Bargaining*
- 14. Environmental Protection*

### *1. Forced Labor (Voluntary Work)*

Our company applies a zero-tolerance policy against forced labor, debt bondage, human trafficking, and other forms of forced labor. Our employees' work relationships are entirely based on voluntary participation and occur without the threat of any penalties.



- Voluntary Work Principle: All work in our company is based on voluntary participation. No employee can be forced to work.
- Right to Resignation: When an employee decides to leave the job, no reason other than safety can prevent or delay this decision.
- Protection of Personal Information: All personal information of our employees is protected and kept confidential according to the law.
- Document Retention: Employees' original passports and identification documents are not retained by our company. These documents remain in the possession of the employees themselves.

## ***2.Child Labor (Underage Employees)***

Our company does not tolerate child labor under any circumstances. The minimum age limits established by national and international laws are strictly followed, and these limits are also considered for interns and trainees.

- Prohibition of Child Labor: Our company strictly prohibits child labor. We take all necessary measures to prevent child labor in accordance with Turkish and international laws.
- Identity Verification: Employees' birthdates are verified through identification documents during the hiring process. Employees under the age of 16 are not employed.
- Ban on Hazardous Work: Interns and young workers are not assigned hazardous tasks or night shifts.
- Prevention of the Worst Forms of Child Labor: Our company strictly prohibits the worst forms of child labor.

## ***3.Discrimination (Equitable Approach)***

Our company values all employees and their contributions. We are deeply committed to opposing discrimination and ensuring equal opportunity. As management, we are determined to maintain an organization free from discrimination or physical or verbal harassment based on race, gender, color, nationality, social origin, religion, age, disability, political opinion, or any other legally protected characteristics or status.

- Equitable Recruitment and Employment: There is no discrimination in recruitment, compensation, training, promotion, or termination processes. All employees are treated equally regardless of race, color, gender, religion, political opinion, national origin, or other statuses.
- Merit-Based Selection: Employee selection for positions in our company is based on minimum qualifications such as open positions, education, interests, skills, and work experience.
- Protection Against Harassment and Violence: Employees are not subjected to physical or psychological discrimination, violence, or harassment. Activities promoting equality, diversity, and inclusion are organized to prevent such negative occurrences.



## ***4.Ethical Business Conduct***

Our company is firmly committed to ethical values and business ethics. We do not tolerate corruption, fraud, embezzlement, or bribery. We act according to the following principles:

- **Zero Tolerance for Corruption:** Our company does not allow any employee or business partner to engage in corrupt activities. Regular controls and audits are conducted to prevent and detect such activities.
- **Measures Against Fraud and Embezzlement:** We apply strict internal control mechanisms to prevent unethical behaviors such as fraud or embezzlement. Legal action is taken if such crimes are detected.
- **Prevention of Bribery:** Employees, suppliers, and business partners are strictly prohibited from offering, accepting, or participating in bribery. Awareness training is provided, and reporting mechanisms are created to prevent bribery.
- **Transparency and Accountability:** Transparency is fundamental in all our business processes. Decisions, actions, and financial matters are carried out in an open and traceable manner. Continuous information is provided to ensure that employees and business partners do not engage in unethical activities.
- **Ethical Behavior Rules:** All employees are required to comply with ethical business conduct rules. These rules are communicated to employees during the hiring process and are periodically reminded. Disciplinary actions are taken against those who engage in unethical behavior.
- **Whistleblowing and Protection:** Employees who detect or suspect ethical violations can report their concerns anonymously. Whistleblowers are fully protected from retaliation, and such reports are carefully investigated.

## ***5.Working Hours and Wages (Salary/Wages)***

Our company is committed to fairly evaluating the labor of our employees. In this context, we offer competitive wages aligned with sectoral and local labor market conditions. Below are the details of this policy:

- **Competitive Wage Policy:** Employees are paid competitive wages in accordance with sectoral and local labor market conditions. Our wage policy is determined fairly, ensuring wage equality among employees in the same position.
- **Compliance with Laws:** Compensation, working hours, overtime, and additional payments are carried out in full compliance with applicable laws and employment contracts. We aim to improve the well-being of our employees beyond legal requirements.
- **Working Hours:** Working hours are organized in accordance with local regulations and industry standards. To maintain a work-life balance, working hours are planned fairly. Overtime is only applied when necessary and with the employees' consent.
- **Overtime Compensation:** Overtime pay is calculated and paid in accordance with local legislation. Employees should not be forced to work overtime, and when overtime is requested, it is compensated fairly.
- **Benefits and Additional Rights:** In addition to wages, employees are offered benefits and additional rights. These rights are determined based on the

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employee's position, working conditions, and performance. Benefits include meal allowances, transportation, health insurance, and more.

- **Career Development and Promotion Opportunities:** Our company offers continuous training and development opportunities to improve employees' skills and capacities. Promotion and advancement opportunities are provided wherever possible to support employees' career growth. Training and development programs are designed to help employees become more successful in their jobs and advance in their careers.
- **Wage Transparency:** Transparency is fundamental in our compensation and benefits policies. Employees have the right to access all details regarding their salary and benefits. The compensation system is structured in a fair, open, and understandable way.

## ***6. Health and Safety***

Our company is committed to taking all necessary measures to ensure that our employees work in a safe and healthy environment. This policy aims to protect employees' physical and mental health, enhance workplace safety, and ensure full compliance with occupational health and safety standards.

- **Safe Work Environment:** Our company continuously conducts risk assessments to minimize employees' exposure to risks such as accidents, injuries, and health threats. A safe, healthy, and productive work environment is created and maintained to ensure its continuity.
- **Occupational Health and Safety Regulations:** All occupational health and safety rules, as regulated by local and national legislation, are strictly implemented in our company. Regular training and information meetings are organized to ensure employees understand and comply with these rules.
- **Protective Equipment and Training:** We provide all necessary protective equipment required for the job. Regular training is also provided on the proper use of this equipment. Employee awareness of occupational health and safety is continuously raised to prevent workplace accidents.
- **Emergency Preparedness:** Periodic drills are conducted to prepare for potential emergencies. Employees are informed about emergency scenarios, such as fires, earthquakes, or chemical leaks, and necessary action plans are developed.
- **Measures Against Violence, Harassment, and Abuse:** Our company strives to provide an environment free from violence, harassment, threats, abuse, and other disruptive conditions. Safe reporting mechanisms are established for employees who encounter such negative occurrences.
- **Regular Inspections and Continuous Improvement:** Regular audits are conducted to determine if there are any deficiencies in the implementation of health and safety standards. Based on audit results, improvement activities are promptly initiated in necessary areas.
- **Employee Participation and Feedback:** Employee feedback related to health and safety is regularly evaluated. Employee participation in health and safety initiatives is encouraged, and this participation helps ensure continuous improvement.



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## ***7. Commitment to Community and Stakeholders***

Our company is committed to building strong and healthy relationships with its stakeholders and continually improving these relationships. Listening to stakeholders' opinions, gathering information from them, and acting upon their suggestions is one of the fundamental principles of our business processes. Below are the details of this policy:

- **Listening to and Evaluating Opinions:** Our company carefully listens to the views of our stakeholders and gathers information from them. By considering stakeholders' ideas and suggestions, we shape our decision-making processes accordingly. This helps us build relationships based on mutual trust, respect, and goodwill.
- **Designation of Employee Representatives:** Employee representatives are selected in accordance with legal regulations. An environment is created where employees can raise their issues, make suggestions, and propose solutions. Employee representatives act as an effective communication channel between the company and the employees.
- **Suggestion and Complaint Boxes:** Suggestion boxes are provided for employees to submit written feedback, opinions, suggestions, and complaints about the company. These boxes are designed to allow employees to express their thoughts securely and anonymously. The feedback collected is regularly evaluated, and necessary improvements are made.
- **Commitment to Dialogue:** Our company is committed to maintaining continuous dialogue with stakeholders regarding workplace rights and issues within the scope of its impact. These dialogues contribute to the transparency of our business processes and the quality of our relationships with stakeholders. Moreover, through these dialogues, we can better understand our stakeholders' expectations and develop solutions that meet them.
- **Stakeholder Participation and Collaboration:** By maintaining regular communication with our stakeholders, we ensure their active participation in our business processes and collaborate with them. These collaborations help improve our business processes and increase stakeholder satisfaction.
- **Evaluation of Feedback:** Feedback from stakeholders is carefully evaluated. This feedback is seen as an important resource for improving our business processes and advancing our company. Based on this feedback, continuous improvement processes are initiated.

## ***8. Employment of Foreign Workers (Employment of Foreign Employees)***

Our company ensures full compliance with all legal requirements throughout the process of hiring and terminating foreign workers. We operate in accordance with the following principles to protect the rights of our foreign employees and provide them with a fair working environment:

- **Comprehensible Employment Contracts:** Employment contracts for foreign employees in our company are prepared in a language they can understand.



All terms and conditions of the employment contract are clearly communicated to employees before they begin their employment. This ensures that employees fully understand their contracts and know their rights.

- **Legal Compliance:** All personnel and administrative processes related to foreign employees, from hiring to termination, are conducted in full compliance with local and national laws. All necessary legal documents and permits are obtained during the hiring process, and work permits and other legal requirements are carefully followed.

- **Prohibition of Debt Bondage:** Our company does not employ foreign workers under any form of debt bondage. It is essential that employees work freely and voluntarily, without being under any financial burden. Our company does not impose any financial obligations or debt on its employees.

- **Protection of Legal Rights:** Our company protects the full legal rights of foreign employees. These rights include working conditions, compensation, social security rights, and job security. No practice is implemented that prevents employees from exercising their legal rights.

- **Prohibition of Hiring Illegal Workers:** Our company does not hire illegal workers under any circumstances. Ensuring that all employees are legally employed and that all necessary documents are provided is one of the core principles of our company. Employment of individuals who do not comply with legal requirements is strictly rejected.

- **Training and Information:** Foreign employees receive regular training on Turkish labor laws, their working rights, and responsibilities. These trainings ensure that employees are aware of and can protect their rights.

- **Work Permit and Immigration Services:** Our company fully supports the process of organizing and renewing work permits and other immigration services for foreign employees. The validity and renewal of work permits are continuously monitored.

## ***9. Rest Days and Holidays***

Our company adopts the fundamental principle of ensuring that employees are not deprived of their rest and holiday days within the framework of their legal rights. Adequate rest and holiday periods are provided to ensure that employees work productively and with motivation. This policy aims to maintain the work-life balance of our employees.

- **Weekly Rest Period:** Employees working five days a week are granted two days of weekly rest in compliance with legal regulations. These rest days are planned and organized to allow employees to rest physically and mentally.

- **Legal Holidays:** Employees are fully granted national holidays and official public holidays. On these days, employees are not required to work unless absolutely necessary, and their holiday rights are respected.

- **Annual Leave Entitlement:** Employees' legally defined annual leave entitlements are fully recognized. Annual leave durations are determined based on the employee's tenure with the company, and employees are encouraged to use their leave. Annual leave is seen as an important opportunity for employees to step away from



work and recharge.

- **Overtime and Leave Balance:** When employees work overtime, overtime pay is provided in accordance with legal regulations, or additional rest time is granted through time-off balancing. Ensuring that employees who work overtime have adequate rest periods is one of our company's priorities.

- **Leave Planning and Flexibility:** Employees' vacation and leave planning are handled with a flexible approach to ensure they do not disrupt business processes. Leave requests are accommodated as much as possible, taking into account employees' special circumstances and needs.

- **Health and Well-being:** Our company encourages employees to take regular breaks to protect their physical and mental health. In cases of extended work periods, we ensure that employees have adequate rest breaks.

- **Protection of Rest Rights:** Employees' rest and holiday rights are respected, and all necessary measures are taken to ensure that these rights are not violated. Protecting employees' rest and holiday rights is an essential part of our company's human resources policies.

## ***10. Recruitment and Employment***

Our company ensures full compliance with the laws during the recruitment and employment processes, adopting a fair and equitable approach. The process of filling the required positions is carried out in a transparent, fair, and systematic manner. Below are the details of this process:

- **Identification of Open Positions:** Our company analyzes current and future job needs and identifies open positions. These positions are defined according to the skills, experience, and qualifications required for the job. During the process of identifying open positions, the company's strategic goals and growth plans are considered.

- **Legal Compliance:** Our recruitment and employment processes are fully in compliance with local and national labor laws. All legal rights of employees are protected during the recruitment process, and legal requirements are fully met. Non-discrimination in recruitment and offering equal opportunities to all candidates are our core principles.

- **Equitable Approach:** During the recruitment process, all candidates are treated fairly and equally. Candidates are evaluated solely based on the qualifications required for the job, without regard to gender, race, color, religion, age, disability, or other personal characteristics. An equitable approach forms the foundation of our company's human resources policy.

- **Employment Contracts:** Employment contracts are signed with new employees in full compliance with applicable laws. These contracts clearly specify all important terms, such as job duties, working hours, salary, leave, and holiday rights. Employment contracts safeguard employees' rights and responsibilities.

- **Compensation and Benefits:** New employees are offered fair and competitive salaries. Our compensation policy is determined based on industry standards and local labor market conditions. In addition, employees' social rights and benefits are clearly outlined in the employment contracts.

- **Leave and Holiday Rights:** Employees' legal rights to annual leave,

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sick leave, maternity leave, and other statutory leave are fully recognized. These leave rights are detailed in the employment contracts and internal company regulations. Employees are encouraged to fully utilize these rights.

- **Orientation and Training:** New employees undergo a comprehensive orientation program about the company culture, policies, and work processes. This program helps employees adapt quickly to our company. In addition, regular training is provided to support employees' professional development.
- **Continuous Review and Improvement:** The recruitment process is regularly reviewed and improved as needed. This ensures the selection of the most suitable candidates for our company's needs and increases the efficiency of the employment process.

## ***11. Employment Contract (Employer Contracts)***

Our company aims to protect employees' rights and clearly define the fundamental terms of the employment relationship through fully compliant employment contracts. Employment contracts are carefully prepared in accordance with the employee's job description, rights, responsibilities, and the company's expectations. Below are the details of this process:

- **Indefinite-Term Employment Contract:** Our company prepares "Indefinite-Term Employment Contracts" in compliance with the law for individuals to be employed. This contract includes the employee's position, duties and responsibilities, working hours, compensation, leave rights, termination conditions, and other important terms. The contract clearly specifies all of the employee's rights and obligations within the company.
- **Overtime Consent:** New employees are required to sign an "Overtime Consent Form" in accordance with legal regulations for cases where overtime is necessary. This form outlines the conditions under which the employee agrees to work overtime and the details of overtime compensation. The employee formally agrees to overtime by signing this consent form.
- **Signing the Employment Contract:** The prepared employment contract is carefully reviewed and approved by the candidate. Once the employee accepts all rights and responsibilities, the contract is signed by both parties. A copy of the contract is provided to the employee, and the employer retains another copy.
- **Orientation Training:** New employees undergo orientation training during the onboarding process. This training provides detailed information about the company's mission, vision, policies, and work processes. Additionally, all rules and regulations required for the job are communicated to the employee. This ensures the new employee adapts quickly and effectively to the company.
- **Legal Compliance and Transparency:** Our employment contracts are fully compliant with local and national laws. All conditions between the employer and employee are clearly outlined in the contract, ensuring transparency. Employees' rights as stated in the contract are legally protected.
- **Updates and Revisions:** Employment contracts are regularly reviewed and updated according to any changes in legal regulations or the company's needs. This process aims to protect the rights of both the employer and employee and ensure



the sustainability of the employment relationship.

## ***12. Workplace and Employee Discipline***

Our company implements certain discipline rules to ensure that employees work in a disciplined and productive manner. These rules are carried out in a fair, transparent, and legally compliant manner, aiming to regulate employees' behavior in the workplace and improve the overall performance of the company. Below are the details of this policy:

- **Discipline Rules:** Our company has established a discipline board to set and monitor workplace discipline rules. The discipline board ensures workplace order and discipline, protects employees' rights, and maintains workplace safety. These rules are clearly communicated to all employees, and the expectations regarding workplace behavior are clearly stated.
- **Prohibition of Salary Deductions:** Our company does not apply salary deductions as a disciplinary measure. Disciplinary actions are determined and implemented in a fair and transparent manner. Instead of salary deductions, alternative disciplinary measures such as warnings, reprimands, or job changes are preferred.
- **Disciplinary Process:** The disciplinary process is carried out fairly and with respect to employees' rights. In case of any disciplinary violation, the employee is first notified in writing and is given the right to defense. The discipline board conducts the necessary investigations and makes decisions based on evidence. Disciplinary decisions are designed to positively influence the employee's future behavior.
- **Workplace Rules and Instructions:** All employees are required to comply with the workplace rules and instructions established by the company. These rules are created to ensure the efficient execution of work, maintain workplace safety, and preserve harmony among employees. Employees are responsible for learning, understanding, and applying these rules.
- **Training and Information:** Regular training and information sessions are held to ensure the effective implementation of discipline rules. These trainings help employees understand and adhere to discipline rules. Additionally, new employees are informed about the discipline rules before they begin work.
- **Employee Participation:** Employees' views and suggestions are considered during the creation and updating of discipline rules. Employee feedback on discipline rules is taken into account to ensure that the rules are fair and enforceable. This helps increase the effectiveness of the discipline rules and acceptance among employees.
- **Continuous Improvement:** Our company regularly reviews the discipline rules and processes and makes improvements where necessary. This ensures that the disciplinary processes remain fair, effective, and up-to-date.

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

Our company fully respects the rights of employees to join unions, engage in collective



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bargaining, and organize. The protection and promotion of these rights are among the core principles of our company. Below are the details of this policy:

- **Right to Join Unions:** Our employees have the right to join or not join unions according to their preferences. Our company ensures that employees can freely exercise this right and imposes no restrictions on it.
- **Right to Organize:** Employees have the right to organize in order to protect and enhance their interests. In this regard, employees can form unions, join existing unions, or participate in other forms of worker organizations outside of unions. Our company respects employees' rights to organize and encourages the use of these rights.
- **Right to Collective Bargaining:** Our employees have the right to engage in collective bargaining to form collective labor agreements. Our company respects employees' rights to engage in collective bargaining and supports their active participation in these processes. Collective bargaining is conducted fairly and transparently between the employer and employees.
- **Prohibition of Pressure and Retaliation:** Our company strictly prohibits any pressure or retaliation that would prevent employees from exercising their rights to union activities or organizing. Dismissal, job changes, or salary deductions as penalties due to union activities are unacceptable.
- **Legal Compliance:** Our company fully complies with local and international laws and regulations concerning union freedom and collective bargaining rights. We act in accordance with the relevant laws and regulations to protect employees' rights.

## ***14.Environmental Protection***

Our company is committed to minimizing the environmental impact of its activities and acting responsibly for a sustainable environment. In this regard, we are dedicated to reflecting our environmental sensitivity in every stage of our business processes. Below are the details of this policy:

- **Environmental Impact Assessment:** Our company regularly evaluates the environmental impacts of all its activities. These evaluations are conducted to identify potential environmental risks and to minimize or eliminate these risks. Environmental impact assessments are planned and implemented from the outset of our business processes.
- **Environmental Management System:** Our company has adopted an environmental management system to manage environmental impacts and achieve sustainability goals. This system is designed to monitor, report, and continuously improve our environmental performance. The environmental management system is developed in accordance with international standards and is regularly reviewed.
- **Efficient Use of Resources:** Our company aims to use natural resources as efficiently as possible. To achieve this, we develop and implement methods to minimize energy, water, and raw material consumption. Innovative technologies and process improvements are continuously researched and integrated to increase resource efficiency.
- **Waste Management:** We implement effective waste management



policies to reduce the environmental impacts of waste generated in our production processes. Reducing, recycling, and reusing waste are our primary goals. The management of hazardous waste is conducted in accordance with legal regulations and best practice standards.

- **Energy Efficiency and Renewable Energy:** To improve energy efficiency, we develop methods to achieve energy savings in our production processes. We promote the use of renewable energy sources and make the necessary investments in this area. Energy efficiency projects are regularly monitored and updated.

- **Environmental Education and Awareness:** We provide regular training to raise environmental awareness among our employees. Awareness campaigns are run throughout the company to increase knowledge about environmental responsibilities and sustainability principles. All of our employees take responsibility for complying with environmental policies.

- **Sustainable Production and Consumption:** Our company offers products and services in line with sustainable production and consumption principles. To achieve our sustainability goals, environmentally friendly materials and processes are preferred. We also consider environmental sustainability criteria in our supply chain.

- **Compliance with Laws and Continuous Improvement:** Our company fully complies with all environmental legal regulations and standards. We apply continuous improvement processes to increase the effectiveness of our environmental policies. These processes are regularly updated to improve our environmental performance and help us achieve our sustainability goals more quickly.

- **Collaboration with Community and Stakeholders:** Our company is committed to collaborating with the community and stakeholders on environmental sustainability. We develop and support projects to raise public awareness on environmental issues. We provide guidance and collaborate with our stakeholders to help them fulfill their environmental responsibilities.

All the principles outlined in this policy document are implemented with the necessary regulations, and the level of implementation is monitored by the relevant departments. The success of our company's social responsibility practices is considered an important criterion in evaluating the performance of our company. This policy document has been prepared to share our clear commitment to fulfilling all responsibilities towards a better world and future with all our employees, stakeholders, and business partners. This policy document has been prepared to share our clear commitment to fulfilling all responsibilities towards a better world and future with all our employees, stakeholders, and business partners.

