

TÜRK TELEKOM HUMAN RIGHTS POLICY

PURPOSE AND BASIS

This Policy is developed to ensure that Türk Telekomünikasyon A.Ş. (Türk Telekom) complies with human rights in its relations with its employees, clients, suppliers, business partners, and all its stakeholders.

United Nations Universal Declaration of Human Rights, the Constitution of the Republic of Turkey, International Labor Organization (ILO) Conventions other conventions ratified by the Republic of Turkey, and the national legislation applicable to human rights and work life formed the basis for the preparation of Türk Telekom Human Rights Policy.

SCOPE

This Policy covers all the managers and employees working at any level at Türk Telekomünikasyon A.Ş. and its subsidiaries including members of their Boards of Directors. Türk Telekom also expects its suppliers and business partners to comply with this Policy, and to encourage their employees to do so. Therefore, provisions undertaking to comply with Türk Telekom Human Rights Policy are included in the contracts made with suppliers and business partners.

RESPECT FOR HUMAN RIGHTS

Human rights are the fundamental rights and freedoms of every human being. Everyone is entitled to these rights without any discrimination on grounds of age, language, race, ethnicity, nationality, health, disability status, gender, marital status, religion and sect, political opinions, philosophical beliefs and faith.

Türk Telekom considers respect for human rights as one of its core values, and it respects fundamental human rights enshrined in the United Nations Universal Declaration of Human Rights, and also respects the physical and moral existence of every human being, and carries out its operations accordingly.

Türk Telekom employees respect human rights, and the main reference in this subject is Türk Telekom Human Rights Policy. Türk Telekom Business Ethics Code, approved by the Board of Directors and disclosed to the public, is also an integral part of this Policy.

Türk Telekom is committed to create a work environment, where there is respect for human rights, and to comply with human rights in its operations.

In line with this objective, Türk Telekom

- Informs and trains its employees and managers on the Human Rights Policy
- Undertakes to provide or cooperate for a fair and reasonable improvement in case of violation of this Policy.
- Addresses opinions of its employees, clients, and stakeholders on human right issues.
- Strives to end and remedy any negative impact of any identified human rights violations by its suppliers and business partners.

DIVERSITY

Türk Telekom values diversity and considers this as an asset, and strives to make its employees feel like they are a part of the Company.

Accordingly, Türk Telekom

- Is committed to equal opportunity, and takes into account the qualifications, performance, skills and experiences of its employees for recruitment, placement, development, training, compensation, promotion, and resignation from the Company.
- Is aware that diversity in its labor contributes to achievement of the Company targets, and strives to recruit candidates with diverse backgrounds and experience, and employ them for a long term.
- Fulfills its legal obligations in relation to employment of people with disabilities, and disadvantages.

DISCRIMINATION AND HARASSMENT

At Türk Telekom;

- No one is discriminated on grounds of age, language, race, ethnicity, nationality, health, disability status, gender, marital status, religion and sect, political opinions, philosophical beliefs and faith.
- Discriminatory and unfair conducts are not tolerated. Employees are provided with a working environment, free from all kinds of ill-treatment, mobbing and harassment.

FREEDOM OF EXPRESSION AND ASSOCIATION

Türk Telekom;

- Respects freedom of expression of its employees, and does not tolerate any conduct preventing exercise of freedom of expression.
- Supports its employees to hold meetings, form labor unions and associations under the applicable laws and regulations.
- Attaches importance to forming a workplace, which promotes cooperation and mutual respect.
- Is committed to engage in a constructive dialogue with labor union representatives elected freely by the employees.
- Aims to construct and develop social dialogue and labor peace with the labor unions.

FORCED LABOR AND CHILD LABOR

Türk Telekom prohibits all kinds of forced labor including compulsory work, forced labor, child labor, employment of illegal migrants, and foreign nationals without a work permit, debt bondage, and any kind of human trafficking. Individuals that are under 18 years of age are not hired, and Türk Telekom complies with international conventions on children rights ratified by the Republic of Turkey, as well as the national legislation. These practices are open to inspection by public authorities.

EMPLOYMENT OF WOMEN AND MOTHERHOOD

Türk Telekom;

- Aims to promote participation of women in the business life, and increase the number of women employed at its workplaces.
- In addition to paid maternal leaves arising under the Code of Labor and given before and after giving birth, female employees are given unpaid maternal leave up to six months if requested, and daily 1.5 hours breastfeeding leave until the child is 1 year old. Expecting or breastfeeding female employees do not work for more than 7.5 hours a day.

WAGES AND WORK HOURS

Türk Telekom;

- Develops its remuneration policy competitively, taking into account the sector, labor market, and other collective agreements in the Republic of Turkey.

- Sets the minimum wage level above the statutory minimum wage.
- Is committed to offer opportunities to its employees that are competitive relative to the market
- Complies with applicable laws, collective agreements, and regulations when setting daily and weekly work hours, overtime, breaks, weekends, and annual paid leave.
- Regularly informs all business units about rules on overtime and audits their implementations.

PROTECTION OF PERSONAL DATA AND LEGAL COMPLIANCE

Türk Telekom;

- Follows the legislation for protection of all the personal data and information of its employees, clients, and those related to its field of its operations, and fulfills its obligations related thereto.
- Communicates its data security policies and procedures to its employees, and creates awareness with its announcements and trainings.
- Avoids any act in all of its operations, which may constitute an offense or violation of rights, and expects its employees to act in the same way.

OCCUPATIONAL HEALTH AND SAFETY

Contrary to the traditional approach, Türk Telekom does not consider occupational health and safety as a target to be achieved, instead it considers this as a dynamic process, and adopts a proactive and productive management approach putting human to the center of investments.

Accordingly, Türk Telekom

- Complies with all applicable national and international regulations on occupational health and safety.
- Strives to prevent/minimize work accidents and occupational illnesses and to create a work safety culture.
- Records and assesses work safety risks to prevent work accidents.
- Conducts projects to control any kind of hazard at all workplaces and associated risks.
- Takes measures as Türk Telekom work sites for the health and safety of its suppliers, business partners, and customers.
- Provides regular trainings to ensure that its employees have sufficient knowledge on occupational health and safety.

ENVIRONMENTAL PROTECTION

Türk Telekom is committed to fulfill its environmental responsibilities and raise environmental awareness of individuals, organizations, and institutions that it interacts whether directly or indirectly. Türk Telekom develops and maintains systems that are based on efficient use of natural resources and the environment.

Türk Telekom;

- Complies with all applicable national and international legal regulations and other obligations involving the environment.
- Controls major environmental impact of its operations, and ensures continuous improvement of its environmental performance.
- Participates in the Zero Waste Project to prevent rapid consumption of natural assets.
- Minimizes consumption of energy and natural resources with its environment-friendly and new technology products.
- Monitors carbon emissions in its operations, and participates in the Carbon Disclosure Project (CDP).

IMPLEMENTATION

Claims and reports about human rights violations are evaluated within the scope of ethical violations, and reviewed and concluded according to procedures and principles set forth in Türk Telekom Business Ethics Code.

a) Reporting Human Rights Violations

Complaints will be sent to

- “etik@turktelekom.com.tr” internally or externally,
- Business Ethics Committee at “Türk Telekom Genel Müdürlüğü, Turgut Özal Bulvarı Kule Binası 25.Kat Aydınlikevler 06103 Altındağ / Ankara”

Any complaint filed to other units and managers of the Company will be forwarded to the Business Ethics Unit at the above address.

b) Roles and Responsibilities

Members of the Board of Directors, and all managers are expected to comply with this Policy, and devote due efforts, and display leadership to ensure compliance by the employees.

Board of Directors is responsible for

- Approving and implementing the Human Rights Policy,
- Reviewing reports of the CEO, and supervision of implementation of the Policy.

General Manager (CEO) is responsible for

- Reviewing the annual report prepared by Vice Presidency of Human Resources on the Policy, and instructing relevant units and managers on preventive and corrective actions for any issue that has been identified,
- Submitting to the Board of Directors an annual report on the Human Right Policy, and any required policy updates.

Human Resources Assistant General Manager is responsible for

- Preparing and publishing the Human Rights Policy, communicating it to the employees, and updating, whenever needed,
- Collecting statements from new employees confirming that they have read, understood, and undertake to comply with the Policy,
- Following up and operating Policy implementation mechanisms,
- Developing an annual report on Human Rights Policy and submitting it to the CEO,
- Reviewing this Policy at least once a year according to requirements.

Legal and Regulation Assistant General Manager is responsible for

- Developing and updating the Human Rights Policy together with the Vice Presidency for Human Resources,
- Ensuring that provisions are included in the contracts with suppliers and business partners that will require them to comply with Türk Telekom Human Rights Policy,
- Filing criminal complaints with the Public Prosecutor’s Office in case of any human rights violation that should be referred to judicial authorities.

Türk Telekom Business Ethics Committee is responsible for

- Ensuring that any complaint is examined/investigated timely, fairly, and carefully, by taking measures to maintain confidentiality and security of individuals reporting human rights violations,
- Discussing and deciding on examination/investigation reports according to Principles and Procedures in Türk Telekom Business Ethics Code,
- Ensuring that any identified violation is remedied, and necessary measures are taken for compliance with the Policy.

Business Ethics Unit is responsible for

- Performing operational activities for publication of the Human Rights Policy, its announcement to employees, and updating whenever necessary,
- Preparing annual report on Human Rights Policy in coordination with relevant units,
- Collecting annual statements from employees that they comply with the Policy,
- Developing the content of annual mandatory training to be given to all employees together with the training unit, to ensure that the Policy is adopted and internalized.

Türk Telekom Employees are responsible for

- Complying with the Human Rights Policy approved by the Board of Directors,
- Reporting any violation of the Human Rights Policy to the address given for reporting ethical violations.

Türk Telekom Subsidiaries are responsible for

- Implementing this Policy after approved by their Board of Directors, and announcing to their employees
- Launching ethical/disciplinary proceedings in their Company in case of violation of the Policy.

c) Sanctions against Violations

Human rights violations may lead to disciplinary proceedings and legal sanctions. In case any violation is determined, sanctions set out in the disciplinary provisions of the relevant Company shall apply. In case of any human rights violation, which should be referred to judicial authorities, a criminal complaint shall be filed with the Public Prosecutor's Office.

d) Validity and Execution

Türk Telekom Human Rights Policy shall come into force, when accepted by the Boards of Directors of Türk Telekomünikasyon A.Ş. and its affiliates, and shall apply as of the dates the employees and relevant parties are informed.