



UET URAN ENDÜSTRİ TESİSLERİ İNŞAAT VE TİCARET A.Ş.

EMPLOYEE, LABOR AND HUMAN RIGHTS POLICY

REV	DATE	PREPARED BY	DEPARTMENT	APPROVED BY
00	15.07.2026	DENİZ TANDOĞAN HAZİNELİ	LEGAL, COMPLIANCE AND RISK MANAGEMENT DEPARTMENT	BÜLENT KARAKAŞ

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1. POLICY STATEMENT

UET URAN Endüstri Tesisleri İnşaat ve Ticaret A.Ş. (“UET URAN” or the “Company”) is an international industrial and EPC contractor operating in the energy, oil and gas, and industrial plant sectors. Our people are our greatest asset, and the success of our projects depends on their skills, dedication and safety.

Through this Employee, Labor and Human Rights Policy (this “Policy”), UET URAN commits to respect internationally recognized human rights, to provide fair, safe and decent working conditions for every person working for or on behalf of the Company, and to avoid causing or contributing to adverse human rights impacts through its own activities or its business relationships. This Policy has been approved by the General Manager and constitutes a binding corporate policy.

2. PURPOSE AND SCOPE

The purpose of this Policy is to define the principles, commitments and management practices of UET URAN with respect to employee rights, labor practices and human rights.

This Policy applies to all directors, managers and employees of UET URAN and its branches and subsidiaries, at all offices, workshops, fabrication facilities and project sites, regardless of location, and to temporary, seasonal and agency workers engaged by the Company. UET URAN further expects its suppliers, subcontractors, joint venture partners, agents and other business partners (together, “Business Partners”) to uphold the principles of this Policy and to apply equivalent standards to their own workforce and supply chains.

Where this Policy sets a higher standard than applicable local law, this Policy shall be followed; where applicable law is stricter, the law prevails. This Policy is communicated to all employees, is incorporated into contracts with Business Partners where appropriate, and is made publicly available on the Company’s website (www.uet.com.tr).

3. REFERENCE FRAMEWORKS

This Policy is based on, and shall be interpreted by reference to, the following international and national frameworks:

- ❖ the Universal Declaration of Human Rights and the International Bill of Human Rights;
- ❖ the ILO Declaration on Fundamental Principles and Rights at Work and the fundamental ILO Conventions;
- ❖ the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises; Principles 1 to 6 of the United Nations Global Compact;
- ❖ ISO 45001 (Occupational Health and Safety Management Systems); and
- ❖ applicable national legislation.

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4. PROHIBITION OF CHILD LABOR

UET URAN does not employ, and does not tolerate the employment of, any person below the minimum working age established by applicable law or by ILO Convention No. 138, whichever is stricter. Age verification controls based on official identity documents are applied in recruitment at all sites, including for subcontractor personnel.

If any instance of child labor is identified in our operations or supply chain, the Company will act in the best interests of the child, prioritizing the child's immediate removal from work, safety, education and family situation.

5. PROHIBITION OF FORCED LABOR AND HUMAN TRAFFICKING

UET URAN prohibits all forms of forced, bonded, indentured, involuntary or compulsory labor, prison labor, debt bondage, and any form of modern slavery or human trafficking, in its own operations and in its supply chain. In particular:

- ❖ **Voluntary Employment:** All work is performed voluntarily, and all employees are free to terminate their employment in accordance with applicable law and their contracts.
- ❖ **Identity Documents:** The retention or confiscation of passports, identity cards, work permits or other personal documents as a condition of employment is prohibited.
- ❖ **Recruitment Fees:** No worker shall be required to pay recruitment fees or related costs to obtain or keep employment with the Company.
- ❖ **Freedom of Movement:** Workers' freedom of movement shall not be unreasonably restricted at sites or in Company-provided accommodation.
- ❖ **Migrant Workers:** Migrant and posted workers are employed with valid work permits and visas and are provided with employment terms in a language they understand before deployment.
- ❖ **Wage Practices:** Wage deductions may only be made where permitted by law; deposits or financial guarantees as a condition of employment are prohibited.

UET URAN applies risk-based controls for forced labor and modern slavery risks in its operations and supply chain, including supplier declarations, recruitment fee checks, worker documentation reviews, migrant worker controls, site audits, worker interviews and corrective action requirements for high-risk countries, activities, products or services.

6. NON-DISCRIMINATION, ANTI-HARASSMENT AND PREVENTION OF VIOLENCE

UET URAN does not tolerate discrimination on the basis of race, color, ethnic or national origin, religion or belief, sex, gender, sexual orientation, age, disability, health status, marital status, pregnancy or maternity, political opinion, union membership or activity, or any other characteristic protected by applicable law. The Company does not tolerate any form of harassment or violence in the world of work, including sexual harassment, psychological harassment (mobbing), bullying, intimidation, verbal or physical abuse, and threats, whether committed by

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managers, colleagues or third parties. All complaints are taken seriously, handled confidentially and investigated promptly, and substantiated violations result in disciplinary action up to and including termination of employment.

7. DIVERSITY, EQUITY AND INCLUSION

UET URAN promotes a diverse and inclusive workforce, equal opportunity and equal pay for work of equal value, and support the development and advancement of under-represented groups, including women in engineering and site roles. Diversity-related indicators, including the share of women in the workforce and in managerial positions, are monitored and reported to General Manager.

8. WAGES, BENEFITS, WORKING HOURS AND EMPLOYMENT TERMS

- ❖ **Written Contracts:** All employees are engaged under written employment contracts, provided in a language they understand, setting out their essential terms of employment.
- ❖ **Registration:** All employees are duly registered with the competent social security institutions, and all wages are paid through official payroll; unregistered or under-declared employment is prohibited.
- ❖ **Fair Remuneration:** Wages meet or exceed the applicable legal minimum wage and applicable collective agreements. UET URAN aims to provide fair and competitive remuneration in line with applicable law, market conditions, job requirements and employee competence, and periodically reviews wage practices to support decent working conditions. Wages are paid regularly, on time and in full, with clear and transparent pay statements.
- ❖ **Overtime:** Overtime is worked only in accordance with applicable law, is compensated at the legally required premium rates or by equivalent time off where permitted.
- ❖ **Working Hours and Rest:** Working hours, night work, rest breaks, weekly rest days, public holidays and paid annual leave comply with applicable legislation; working time at project sites is planned and recorded accurately.

9. FREEDOM OF ASSOCIATION AND SOCIAL DIALOGUE

UET URAN respects the rights of its employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly, in accordance with applicable law, and equally respects the right of employees not to join a union. Union membership or activity shall not give rise to any discrimination, harassment, intimidation or retaliation.

10. OCCUPATIONAL HEALTH AND SAFETY

The health and safety of our employees, subcontractor personnel, visitors and all persons affected by our activities is our first priority and a non-negotiable condition of doing business. UET URAN pursues a “zero harm / zero incidents” culture and maintains an OHS management system aligned with ISO 45001 and applicable OHS legislation in all countries of operation. In particular:

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- ❖ **Risk Management:** Systematic hazard identification, risk assessments, safe method statements and permit-to-work systems are applied at all workplaces and project sites before and during the execution of works.
- ❖ **Training and Competence:** All personnel, including subcontractor workers, receive mandatory OHS induction and periodic training, and task-specific instruction. Only trained, competent and, where required, certified personnel perform high-risk activities such as work at height, lifting operations, confined space entry, hot works and electrical works.
- ❖ **Protective Measures:** Collective protection measures take precedence over personal measures. Appropriate personal protective equipment is provided to all workers free of charge and its use is mandatory.
- ❖ **Stop-Work Authority:** Every person at a UET URAN workplace has the right and the duty to stop any work that presents an imminent danger, without fear of reprisal.
- ❖ **Incident Management:** All incidents, near misses and unsafe conditions must be reported. Incidents are investigated to identify root causes, and corrective and preventive actions are implemented and tracked to closure.
- ❖ **Health and Emergency Preparedness:** We provide health surveillance appropriate to workplace risks, first aid facilities, and site-specific emergency response plans that are periodically drilled.

OHS performance is monitored through measurable objectives and key performance indicators (including lost time injury frequency rate, near-miss reporting and training hours), which are reviewed regularly by senior management.

11. TRAINING, DEVELOPMENT AND CAREER MANAGEMENT

UET URAN invests in the professional and technical development of our employees through annual training plans, on-the-job training, mentoring and performance evaluations. Training needs are reviewed regularly, and training hours are monitored as a key performance indicator.

12. EMPLOYEE WELLBEING AND WORKING ENVIRONMENT

We promote a healthy balance between work and private life, taking into account the demands of project-based and site-based work, including rotation and leave planning for personnel assigned to remote or international projects. Where the Company provides accommodation, catering or transportation at project sites, these are provided at decent standards, including safe and hygienic living quarters, adequate sanitation, clean drinking water, appropriate nutrition and rest areas.

13. HUMAN RIGHTS DUE DILIGENCE

In line with the UN Guiding Principles on Business and Human Rights, UET URAN implements risk-based human rights due diligence proportionate to the nature, size and location of its activities. This includes: identifying and assessing actual and potential human rights impacts when entering new countries, projects or business relationships; integrating the findings into project planning,

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contracting and Business Partner prequalification; taking appropriate action to prevent and mitigate identified risks, with particular attention to vulnerable groups such as migrant workers, young workers and local communities; tracking the effectiveness of measures taken; and communicating on our approach.

14. SUSTAINABLE PROCUREMENT, BUSINESS PARTNERS AND SUPPLY CHAIN

UET URAN is committed to building a responsible and sustainable supply chain and expects its suppliers, subcontractors, service providers and other business partners (together, “Business Partners”) to conduct themselves in accordance with the principles of this Policy or equivalent standards of their own. Compliance with this Policy (or equivalent standards) is incorporated into our contracts with Business Partners, who are expected to cascade equivalent requirements to their own supply chains.

UET URAN applies a risk-based due diligence approach to identify, prevent, mitigate, bring to an end and, where appropriate, remediate actual or potential adverse human rights and environment-related impacts in its own operations, project sites and business relationships. Due diligence outcomes are considered in supplier selection, subcontractor approval, contract management, site monitoring, corrective action and business relationship decisions.

Business Partners may be subject to risk-based prequalification, human rights and labor assessment, audits, worker interviews, document requests, corrective action plans and performance monitoring.

Labor Agencies and Migrant Worker Controls: Where workers are recruited, supplied or employed through labor agencies, manpower suppliers, subcontractors or other third-party intermediaries, UET URAN applies risk-based controls proportionate to the country, project and workforce risk. Such controls include, as applicable:

- ❖ the prequalification and assessment of labor agencies and manpower suppliers, including legal standing, recruitment practices and employment practices;
- ❖ obtaining a written declaration from the relevant labor agency, manpower supplier or subcontractor confirming that no recruitment fees or related costs have been charged to, or will be recovered directly or indirectly from, any worker;
- ❖ verification that wages are paid directly to the worker’s own bank account or through another lawful and traceable payment method directly accessible by the worker, without unauthorized intermediaries, deductions or withholding; and
- ❖ systematic monitoring of the validity and expiry dates of passports, visas, work permits, residence permits and other legally required employment documentation.

Serious or persistent violations of this Policy may result in suspension, withholding of approval, require remediation or termination of the business relationship.

15. COMMUNITY ENGAGEMENT, SOCIAL RESPONSIBILITY AND SECURITY

 UET URAN INDUSTRIAL PLANTS	EMPLOYEE, LABOR AND HUMAN RIGHTS POLICY	REV.	00
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UET URAN respects the human rights of the communities. We take measures to minimize the disturbance caused by our construction activities (including traffic, noise and dust), prioritize local employment and local sourcing where feasible, and we engage with local communities and authorities openly and in good faith. Community members and other external stakeholders may raise concerns or complaints through the channels described in this Policy, and such complaints are handled diligently and without retaliation. Where security services are used at our sites, security providers are selected and instructed to act in a manner consistent with applicable law and respect for human rights, using force only when strictly necessary and proportionate.

16. COMPLAINT MECHANISM, WHISTLEBLOWING AND NON-RETALIATION

Every employee, every worker of a Business Partner and every external stakeholder may raise, in good faith, complaints or reports of actual or suspected violations of this Policy through any of the following channels:

- ❖ the person's direct manager or the relevant department manager;
- ❖ the Human Resources Department;
- ❖ the Legal, Compliance and Risk Management Department; or
- ❖ the dedicated ethics e-mail address ethics@uet.com.tr.

Reports may be made anonymously. The complaint mechanism shall be communicated in languages and formats that are understandable and accessible to employees, workers of Business Partners and relevant external stakeholders. Information on the available reporting channels shall be provided through employee onboarding, project and site inductions and other appropriate means. Particular attention must be given to ensuring effective access for migrant workers, posted workers, temporary workers and subcontractor personnel.

Reports shall be acknowledged within a defined and reasonable period, unless the report has been submitted anonymously through a channel that does not permit further communication. All reports shall be recorded in a secure and confidential case-management or tracking system, assigned an appropriate reference number and monitored through assessment, investigation, corrective action and closure. All reports are treated confidentially to the maximum extent possible, are assessed promptly, and, where warranted, are investigated fairly, impartially and diligently, respecting the rights of all persons involved, including the presumption of innocence.

Where a violation is substantiated, appropriate remedial and corrective actions shall be taken without undue delay. UET URAN shall also assess the root causes of the violation and strengthen relevant preventive measures, controls, training, contractual requirements or monitoring arrangements in order to reduce the risk of recurrence.

UET URAN strictly prohibits retaliation of any kind – including dismissal, demotion, harassment or any other adverse treatment – against any person who reports a concern in good faith or participates in an investigation. Retaliation is itself a violation of this Policy and will result in disciplinary action. Knowingly making a false or malicious report is likewise a violation of this Policy.

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17. GOVERNANCE, IMPLEMENTATION, TRAINING AND MONITORING

Responsibility for this Policy is allocated as follows:

- ❖ **Board of Directors:** receives periodic reports on labor and human rights matters.
- ❖ **General Manager:** approves this Policy, oversees and leads its implementation, by example, allocates the necessary resources.
- ❖ **Human Resources Department:** administers this Policy on a day-to-day basis in recruitment, employment terms, remuneration, training, performance management, employee relations, manages the complaint and whistleblowing channels and reports its findings to Legal, Compliance and Risk Management Department, General Manager and the Board of Directors at least annually.
- ❖ **Legal, Compliance and Risk Management Department:** advises on legal requirements, coordinates human rights due diligence, and assists Human Resources Department regarding compliance with this Policy.
- ❖ **Managers:** communicate this Policy to their teams, ensure its application within their areas of responsibility, including with respect to subcontractor personnel working under the Company's coordination, and support employees who raise concerns.
- ❖ **All Employees:** are required to read, understand and comply with this Policy, to treat colleagues with dignity and respect, to complete assigned training, and to raise questions and concerns.

This Policy is communicated to all employees as part of onboarding and through periodic awareness activities, and all employees receive periodic training on this Policy. Implementation of this Policy is monitored through key performance indicators, internal audits and management reviews, and the results are used to drive continuous improvement. The effectiveness of the complaint mechanism shall be reviewed periodically using appropriate qualitative and quantitative indicators, which may include the number and categories of reports received, acknowledgement and closure times, the proportion of substantiated reports, corrective actions implemented, recurrence of similar issues, accessibility of the reporting channels and stakeholder awareness of the mechanism.

18. CONSEQUENCES OF VIOLATIONS

Violations of this Policy will not be tolerated. Where UET URAN identifies that it has caused or contributed to an adverse human rights impact, it will cooperate in legitimate remediation. Employees who violate this Policy are subject to disciplinary measures in accordance with applicable labor legislation and the Company's internal disciplinary procedures, up to and including termination of employment. Violations by Business Partners may result in corrective action, suspension or termination of the business relationship, and claims for damages. Where a violation may constitute a criminal offence, UET URAN reserves the right to refer the matter to the competent authorities.

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19. REVIEW AND UPDATES

This Policy is reviewed annually, and whenever significant legal, regulatory or operational developments so require, by the Human Resources Department with assistance of the Legal, Compliance and Risk Management Department (when required), and any amendments are approved by the General Manager. The current version of this Policy is available on the Company's website and internal systems and supersedes all previous versions.

This Policy forms an integral part of UET URAN's governance, compliance, sustainability and management framework. It shall be read, interpreted and implemented in conjunction with the Company's other applicable policies, procedures, standards, forms and operational controls, which include without limitation the following documents:

- ❖ Code of Conduct and Business Ethics Policy;
- ❖ Procurement Procedure;
- ❖ General Supplier Prequalification Form;
- ❖ Subcontractor HSE and Human Rights Addendum Form;
- ❖ HSE Procedure;
- ❖ Training Procedure; and
- ❖ Corrective and Preventive Action (CAPA) Procedure.