

## **1. Goal and Scope**

We as ART Tersane A.Ş., work with the vision of contributing to economic, environmental and social sustainability. We aim to protect basic human rights in all business processes. We aim to provide a work environment that complies with international standards, where employees can improve themselves, express their opinions freely and not be subject to discrimination.

The Policy covers primarily the employees, as well as business partners and suppliers. ART Tersane A.Ş. communicates the rules outlined in the policy to employees via annual training programs. Aside from its employees, the Company also communicates the Policy to its business partners and suppliers, and includes it in contracts so as to encourage the latter to comply with the principles outlined in the Policy.

The Policy has come into force as of 19/04/2024, upon the approval of the Board of Directors and are reviewed annually in line with our company's continuous improvement policies.

## **2. Principles, Commitments and Related Practices**

In the scope of this Policy, ART Tersane A.Ş. commits to the following:

### **2.1 Respect for Human Rights**

In line with the Universal Declaration of Human Rights, ART Tersane A.Ş. respects universal human rights in its activities, and strives to prevent human rights violations.

We treat all of our employees with respect and dignity and promote diversity and inclusion in the workplace. Violations, such as physical abuse and/or harassment, or the threat of either, are not tolerated. All employees will be allowed access to basic liberties while on Company premises.

### **2.2 Respect for Equal Opportunity, Difference and Diversity**

In human resources practices such as remuneration, recruitment, personnel and professional development, employees receive an egalitarian treatment without any discrimination on the basis of gender, language, religion, race, ethnicity, sexual orientation, nationality, age, pregnancy, nursing, marital status, trade union membership, political opinion etc., and no such discrimination is tolerated. ART Tersane A.Ş. pursues its approach towards employees in line with the right person for the right job principle, and manages processes in a transparent fashion according to the qualifications, experience and performance of employees. It respects diversity as an important building block of organizational structure

### **2.3 Right to Collective Bargaining and Freedom of Association**

ART Tersane A.Ş. respects employees' rights to collective bargaining and freedom of association.

### **2.4 Freedom of Expression**

It is committed to eradicating any impediment before employees' exercise of their right to the freedom of expression in the workplace.

## **2.5 Healthy and Safe Work Environments**

ART Tersane A.Ş. places a special emphasis on creating the conditions and environment for all employees to work in a safe and pleasant manner, and performs all operations along the “zero accident” principle. ART Tersane A.Ş. is committed to full compliance with international OHS principles and national legislation and regulations, and strives to deliver best practices which go beyond its statutory obligations

## **2.6 Prevention of Maltreatment**

ART Tersane A.Ş. shows no tolerance to maltreatment, mobbing or abuse in the workplace.

## **2.7 Forced Labor and Human Trafficking**

At ART Tersane A.Ş., there is an absolute ban on forced labor and human trafficking.

## **2.8 Working Hours, Wages, Benefits**

ART Tersane A.Ş. compensates employees competitively relative to the industry and local labor market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws. ART Tersane A.Ş. commits to provide all workers with formal employment agreements that clearly state terms and conditions of employment.

We follow applicable laws regarding mandatory overtime and payment of wages, including paying at least the minimum wage and overtime premium according to applicable law.

## **2.9 Children Labor**

ART Tersane A.Ş. bans the use of child labor in line with the principle of the abolition of child labour underscored in the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work.

## **2.10 Criminal Acts**

ART Tersane A.Ş. does not engage in any criminal activity or violation of rights in its activities. Likewise, ART Tersane A.Ş. expects its employees to display the same conscientious attitude.

## **2.11 Stakeholder Feedback**

ART Tersane A.Ş. attaches importance to stakeholder feedback and opinions on the Policy. Feedback on Policy and possible Policy violations and unconformity are communicated to

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### **3. Compliance, Monitoring, Audit and Reporting**

3.1 The top official responsible for the human rights policy is the Board Member.

3.2 The Board of Directors are responsible for supervising the creation and functioning of notification, investigation and sanction mechanisms in case of non-compliance with the Human Rights Policy, rules and regulations.

3.3 ART Tersane A.Ş. identifies the groups that may be most affected by possible human rights issues which may arise from its operations, and in case its operations have a negative effect on human rights, it tries to mitigate such effects. When human rights come under risk, ART Tersane A.Ş. contacts the authorities and takes the necessary measures.

3.4 The system in place ensures the anonymity of any denunciations of Policy violations.

3.5 Ethics Committee reviews the Policy once every year, and monitors the implementation of the Policy. In case stakeholders provide feedback on the Policy, the Committee swiftly takes action and reviews the Policy

### **4. Settlement of Policy Violations**

4.1 In scope of the Policy, official and unofficial complaint management mechanisms are being developed in order to compensate for any rights violations by ART Tersane A.Ş.

4.2 When it deems necessary, the Ethics Committee may consult experts and receive their opinions, after taking the necessary precautions to protect confidentiality during investigation. During the investigation, the Ethics Committee is given all the documents and information that it requests. All employees are under the obligation of assisting the Ethics Committee in this respect.

An employee expressing concerns in the scope of the Policy does not face any retaliation, and such notifications are received via procedures that protect anonymity. Non-compliance with the Policy may result in disciplinary punishment or other sanctions.

SALİH BOSTANCI  
Shipyard Manager