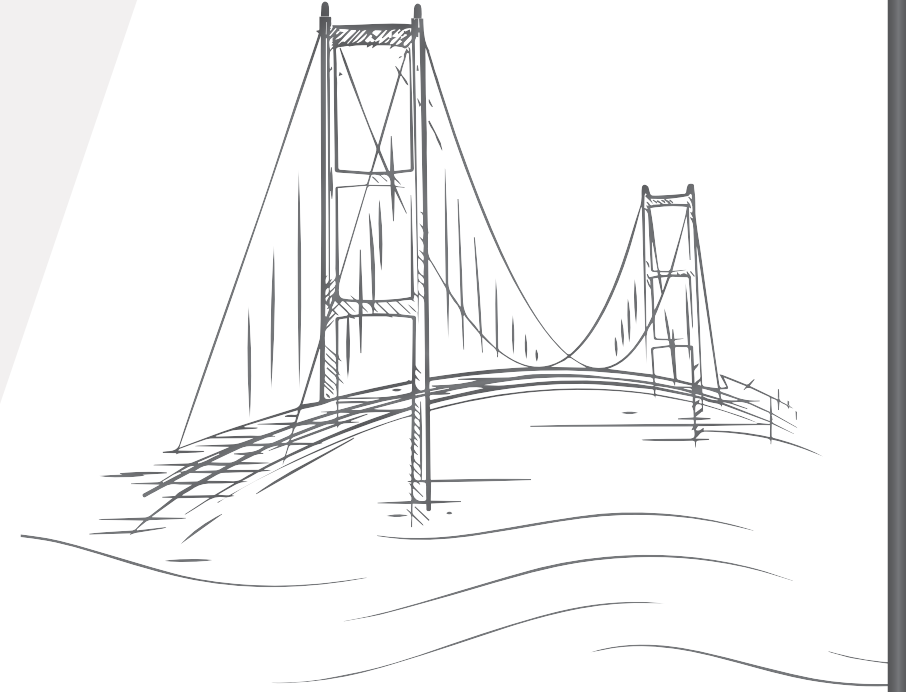


ÇANAKKALE MOTORWAY AND BRIDGE

**HUMAN RIGHTS
POLICY**



1915ÇANAKKALE

INTRODUCTION

Çanakkale Otoyol ve Köprüsü İnşaat Yatırım ve İşletme A.Ş. (ÇOK A.Ş.) publicly declares its commitment to respect internationally recognized human rights standards and to comply with applicable domestic legislation in all of its operations through its Human Rights Policy.

ÇOK A.Ş. undertakes to ensure that all business processes and documents are aligned with applicable international legislation and conventions, as well as national labor law regulations, with due consideration to all human rights particularly, the right to form and join trade unions, the right to strike and engage in collective bargaining, the prohibition of forced labor, the prohibition of child labor, the prohibition of discrimination, prohibition of non-compliance with the obligations related to occupational health and safety, the prohibition of economic or sexual exploitation or slavery, and the right to fair (reasonable) remuneration.

This Policy is an integral part of Environmental and Social Management System (ESMS), Stakeholder Engagement Plan (SEP) and Employment Policy Document (EPD) of ÇOK A.Ş. The EPD sets out the Project's policies on labour and working conditions and confirms ÇOK A.Ş.'s (and their sub-contractors) commitment to comply with the laws and regulations of the Republic of Türkiye and with relevant international standards including International Labour Organization Conventions (ILO) conventions ratified by Türkiye and the relevant labour and working conditions policies and standards of the International Finance Corporation (IFC), and the Equator Principles Equator Principles IV (EP IV), internationally recognized human rights and implementation of the United Nations (UN) Guiding Principles on Business and Human Rights (2011) and Good Industry Practices (GIP).

In the same vein, ÇOK A.Ş. expects all its stakeholders to comply with ÇOK A.Ş. Code of Ethical Conduct, its internal policies, and all binding legislation.

WHAT IS THE PURPOSE OF THIS POLICY?

This policy provides a basis for reflecting ÇOK A.Ş.'s and all its stakeholders' responsibility to respect human rights on all business processes and aims to provide

information regarding the following:

- The human rights principles adhered to by ÇOK A.Ş. and ÇOK A. Ş.'s commitments.
- Individuals and organizations obliged to comply with this Policy .
- Channels to be referred in case of non-compliance with the Policy.

WHO IS SUBJECT TO THIS POLICY?

All of the stakeholders listed below are required to act in accordance with this Policy and align their business processes with the principles stated herein:

- ÇOK A.Ş. employees and managers
- ÇOK A.Ş. suppliers
- All other third-parties (consultants, intermediaries, agents, etc.)

This Policy enables ÇOK A.Ş. to reflect its commitment to human rights and ethical business practices, and assigns the responsibility to its senior management to cooperate with both internal and external stakeholders.

WHAT ARE THE PRINCIPLES WE ADHERE TO?

Respect for Human Rights

ÇOK A.Ş. is committed to treating all employees with respect and fairness, avoiding discrimination, and providing a safe and healthy working environment that respects human dignity.

ÇOK A.Ş. acts with integrity toward all employees in accordance with the principle of maintaining a work environment free from all forms of mistreatment including physical, verbal, and psychological. The same applies to all stakeholders of ÇOK A.Ş.

Prohibition of Discrimination

ÇOK A.Ş. treats its employees fairly and without discrimination in all aspects of employment, including recruitment, remuneration and benefits, training, promotion, transfer, and termination, based solely on their ability to meet the requirements and standards of their jobs. ÇOK A.Ş. acts regardless of race, religion, ethnic or national origin, disability, sexual orientation, gender, or marital status (among others).

Safe and Healthy Working Environment

Employees' working conditions comply with internationally recognized minimum working standards, occupational health and safety criteria, and the legislation of the country of operation. Compliance with ILO core labor standards is mandatory. The working conditions and standards of ÇOK A.Ş. employees are in compliance with the Labor Law, Occupational Health and Safety Law, and all applicable national legislation and working standards. ÇOK A.Ş. is committed to taking all necessary measures and providing required training in this regard.

In this regard, ÇOK A.Ş. is committed to preventing child labor and forced labor, non-discrimination in the workplace, and respecting the rights to freedom of assembly and association. Likewise, ÇOK A.Ş. encourages the development of internal learning, management capacity, and leadership in human rights matters.

Prohibition of Forced Labor

ÇOK A.Ş. and all its business partners refrain from using prison labor, uncontracted labor, debt bondage, or any other form of forced labor methods. No employee shall be compelled to work under any form of coercion, intimidation, pressure, or be punished for possessing or expressing any opinions. Forced labor, discrimination, and mistreatment in any form are explicitly prohibited in all activities and throughout the supply chain of ÇOK A.Ş.

Prohibition of Child Labor

ÇOK A.Ş. and its business partners do not employ child labor. There is zero tolerance for child labor in ÇOK A.Ş.'s operations and supply chain.

ÇOK A.Ş. Fair Remuneration and Working Hours

ÇOK A.Ş. recognizes its employees' right to rest and leisure and therefore always acts in compliance with national legislation regarding working hours and overtime.

ÇOK A.Ş. and its business partners assume full responsibility for all work carried out within the appropriate legal framework. Similarly, no attempt shall be made to evade the employer's obligations towards dependent employees by concealing a relationship of an employment nature or by excessive use of temporary or subcontracted labor.

Every employee has the right to compensation within the legal framework. ÇOK A.Ş. and its business partners comply with all legal requirements regarding remuneration and provide any additional benefits required by the law or the contract.

Freedom of Association and Collective Bargaining

ÇOK A.Ş. respects the rights of employees to join a trade union and to engage in collective bargaining without fear of retaliation as well as their freedom of choice.

ÇOK A.Ş. is committed to engaging in constructive dialogue with freely elected representatives of employees represented by a legally recognized trade union.

Community Engagement

ÇOK A.Ş. commits to engage with local communities including vulnerable groups, to understand their concerns and ensure that their rights are respected throughout the project.

OUR REPORTING RULES AND COMMUNICATION CHANNELS

ÇOK A.Ş. values the views of its stakeholders. We maintain open speak-up mechanisms that encourage feedback from customers, shareholders, employees, and suppliers.

This Policy supports you in disclosing any action that you consider inconsistent with

applicable legislation or OK A.Ş. Code of Ethical Conduct through the speak-up channels listed below:

Telephone: You may call **0212 800 65 81**

E-mail: You can send an e-mail to **cok.ethics@speak-hub.com**

Disclose Form: You can fill out the disclose form on **www.speak-hub.com/cok-ethics**

DISCIPLINE

Any violation of this Policy may result in serious disciplinary measures, including termination of employment. In cases where this Policy is violated by third parties, their contracts may be terminated. Any actions that are contrary to this Policy are reviewed and resolved by the Disciplinary Board in accordance with the principles and procedures outlined in the OK A.Ş. Disciplinary Policy.

DOCUMENT UPDATING, STORAGE AND PUBLICATION

OK A.Ş. ensures that this Policy is the most up-to-date version in force and publicly available. This Policy and its all previous versions are retained indefinitely within OK A.Ş.'s document management systems. In case a revision to this Policy is required, the Ethics and Compliance Committee is responsible for conducting the necessary revisions and announcing the revision to all parties affiliated with this Policy.

This Policy entered into force pursuant to the Board of Directors decision dated 17.09.2025.