

# SOCIAL COMPLIANCE POLICY

As Bozankaya Rail Systems Inc., our Social Compliance Policy includes the standards we have established in accordance with our principles and values and ensures they become a part of the company culture. By sharing our Social Compliance Policy with all our employees, we commit to granting all rights arising from these standards, complying with occupational health and safety rules, being environmentally conscious, and creating a workplace where open and honest communication, respect, and value are upheld.

Through Bozankaya Rail Systems' Social Compliance Policy, we commit to preventing discrimination, pressure and mobbing, harassment, child labor, forced labor, corruption and bribery, and protecting the rights of foreign employees.

#### 1. **DISCRIMINATION**

All recruitment, promotion, assignment, and training processes are carried out with sensitivity to discrimination.

Bozankaya pledges not to allow any form of discrimination based on race, gender, nationality, religion, age, disability, sexual orientation, or political opinion; it ensures equal rights and opportunities for all employees and strives to act fairly.

# 2. PRESSURE & MOBBING

Systematic violence, psychological violence, harassment, discrimination, humiliation, or any actions and statements that reduce employee motivation fall under the scope of Pressure & Mobbing. Additionally, actions such as marginalization, judgment, exclusion, belittling, blaming, questioning one's work, questioning one's personality, and ignoring them, which are persistent, continuous, systematic, and often increasingly severe, leading to employee exhaustion and reduced productivity, are defined as mobbing.

Bozankaya Rail Systems commits to preventing pressure and mobbing and to intervening immediately if such a situation occurs.

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## 3. HARRASMENT

Any verbal, written, physical, or visual behavior directed at a person's religion, language, ethnicity, gender, race, age, status, sexual orientation, gender identity, physical structure or appearance, health status, or entirely personal characteristics that is degrading, humiliating, aggressive, or insulting and causes discomfort and distress is considered harassment.

In identifying harassment, not only the intent but also the psychological impact on the other party should be considered.

Bozankaya Rail Systems commits to preventing harassment and intervening immediately in case of such an event.

#### 4. CHILD LABOR

Bozankaya Rail Systems strongly opposes child labor practices that deprive children of their right to education and cause physical and psychological harm. Bozankaya Rail Systems commits not to employ child labor.

#### 5. FORCED LABOR

Bozankaya Rail Systems commits to preventing forced labor and ensuring that such practices do not occur.

#### 6. CORRUPTION & BRIBERY

Corruption refers to individuals using their titles or powers for direct or indirect personal gain. Bribery includes the offer, promise, request, acceptance, or facilitation of benefits to encourage or delay work completion, bypassing job responsibilities.

- Bribery and corruption may involve monetary transactions as well as political or other donations, commissions, social rights, gifts, entertainment, and various other benefits.

Bozankaya Rail Systems strongly opposes all forms of bribery and corruption and commits to preventing such situations.





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### 7. FOREIGN EMPLOYEES

For foreign employees working within Bozankaya Rail Systems, employment contracts are prepared in a language they can understand. Bozankaya Rail Systems commits to protecting the legal rights of foreign workers.

> Chairman of the Board Aytunç GÜNAY