

 <p>Kararlılık, Geleceğe Kaliteli 1973'den beri.</p>	<b>MODERN SLAVERY ACT POLICY</b>	Document No:	İÇKE.11
		Release Date:	30.01.2026
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## 1. Purpose

Işıklar Construction Materials Industry and Trade Inc. considers the protection of human dignity a fundamental value in conducting its activities. The purpose of this policy is to systematically prevent the risks of modern slavery and human trafficking throughout production processes and the supply chain, identify potential risks at an early stage, and effectively eliminate any identified violations.

The company acts with the awareness that combating modern slavery is not only a legal obligation but also an integral part of sustainability, corporate responsibility, and ethical management.

## 2. Scope

This policy covers all employees, managers, interns, temporary workers, suppliers, subcontractors, business partners, and all third parties acting on behalf of the Company at all Işıklar Construction Materials production facilities.


## 3. Basic Concepts

- **Modern Slavery:** Forced labor, debt bondage, human trafficking, child labor, and all forms of work that eliminate or restrict a person's free will.
- **Forced Labor:** The employment of a person against their will through threats, coercion, debt bondage, confiscation of documents, or similar means.
- **Child Labor:** The employment of age groups prohibited by national legislation and ILO conventions.
- **Human Trafficking:** The recruitment, transportation, harboring, or control of persons for the purpose of exploitation.

## 4. Corporate Commitments

Işıklar Construction Materials Industry and Trade Inc. considers combating modern slavery and human trafficking to be one of the fundamental elements of its corporate governance approach, sustainability strategy, and ethical values. In this context, the Company makes the following commitments:

- The Company does not tolerate any form of modern slavery, including forced labor, debt bondage, child labor, and human trafficking, in its own activities or at any stage of its supply chain.
- The Company ensures that all employees are employed of their own free will and that recruitment processes are conducted in a transparent, voluntary, and legally compliant manner. No employee is required to pay any fee, commission, or similar charge in exchange for employment, placement, accommodation, or continued employment.

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- It strictly prohibits the confiscation of employees' identity documents, passports, or personal documents. Employees' right to leave their job is protected in accordance with the law.
- It commits to applying wages, working hours, overtime, and leave entitlements in accordance with applicable legislation and collective bargaining agreements.
- Given the labor-intensive nature of the brick production and construction materials sector and the widespread use of subcontractors, it develops preventive control mechanisms that take human rights risks into account.
- Evaluates human rights, ethical working conditions, and anti-modern slavery criteria in supplier and subcontractor selection processes; aims to incorporate these issues into contractual obligations.
- Emphasizes addressing risks identified in the supply chain not only through sanctions but also, where possible, through remediation, guidance, and monitoring.
- Effectively operates reporting mechanisms that ensure confidentiality and protection against retaliation, enabling employees and stakeholders to freely voice their concerns regarding modern slavery and human trafficking.
- Monitors the effectiveness of anti-modern slavery practices through ISO management systems and internal audits, and implements necessary improvements.

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## 5. Roles and Responsibilities

### Management


- Ensure the implementation and effectiveness of the policy,
- Regularly assess modern slavery risks,
- Ensure the policy's compliance with ISO management systems and sustainability reporting.

### Human Resources and Procurement Units

- Ensure ethical hiring processes,
- Apply human rights criteria in supplier selection,
- Obtain written commitments from subcontractors and suppliers.

### Employees

- Act in accordance with the provisions of the policy,
- Report suspicious or inappropriate situations without delay,
- Not be part of practices that violate human rights.

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### Suppliers and Business Partners

- Comply with this policy or equivalent standards,
- Ensure that similar principles are applied in the sub-supply chain.

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### 6. Risk Assessment

The company assesses modern slavery risks in raw material procurement (clay, energy sources), seasonal and subcontracted labor, transportation, and storage activities using a risk-based approach. On-site inspections and additional controls are implemented in high-risk areas. For identified risks, audits, contractual obligations, and corrective action plans are established.

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### 7. Compliance and Standards

The Company commits to conducting its activities in accordance with the local and international regulations listed below and to fully comply with these regulations as part of its efforts to combat modern slavery and human trafficking.

#### 7.1 Local Legislation

The Company shall comply with:

- The provisions of the Constitution of the Republic of Turkey regarding the right to work, personal freedom and security, and the prohibition of forced labor;
- The provisions of Labor Law No. 4857 regarding working conditions, wages, working hours, and the employment of children and young workers;
- the provisions of the Occupational Health and Safety Law No. 6331 regarding the protection of workers' health and safety,
- the provisions of the Turkish Code of Obligations No. 6098 regarding service contracts,
- the provisions of the Turkish Penal Code No. 5237 regarding the crimes of human trafficking, forced labor, and deprivation of liberty,
- Obligations to prevent unregistered employment under the Social Insurance and General Health Insurance Law No. 5510,
- Compliance with relevant secondary legislation and administrative regulations.

#### 7.2 International Regulations

The Company;

- International Labor Organization (ILO) conventions to which the Republic of Turkey is a party (in particular No. 29 Forced Labor, No. 105 Abolition of Forced Labor, No. 138 Minimum Age, and No. 182 Worst Forms of Child Labor),

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- The United Nations Universal Declaration of Human Rights,
- The United Nations Guiding Principles on Business and Human Rights,
- The OECD Guidelines for Multinational Enterprises,
- The Ethical Trading Initiative (ETI) Core Labor Principles.

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## 8. Reporting and Protection Mechanisms

Reports of risks, suspicions, or violations related to modern slavery or human trafficking may be made through channels designated by the Company in accordance with the principles of confidentiality and protection against retaliation. No person making a report in good faith shall be subjected to adverse treatment.

If you believe that the Işıklar Holding Group Code of Business Ethics has not been complied with, or if you wish to inform us of any issues so that we can identify and take measures against risks we may encounter, you can report them to the Işıklar Group Ethics Hotline ([etikhat@isiklar.com.tr](mailto:etikhat@isiklar.com.tr)).

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## 9. Training and Awareness Activities

The company conducts regular training and awareness activities to enable its employees and relevant suppliers to recognize the risks of modern slavery. Training content is updated taking into account sectoral risks.

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## 10. Violations and Corrective Actions

In the event of a policy violation, disciplinary procedures are implemented according to the nature of the incident, priority is given to protecting the victim, and corrective and preventive actions are taken to prevent recurrence. In the case of supplier-related violations, improvement is requested and contractual sanctions are imposed where necessary.

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## 11. Review

This policy is reviewed periodically in light of legal changes, industry practices, audit results, and sustainability goals.

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**GENERAL MANAGER**