



POLICY 01 • KRB-POL-01

Human Resources Policy



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1.1 Purpose

The purpose of this Policy is to define the fundamental principles, rules and responsibilities regarding the selection, recruitment, development, evaluation, rewarding and retention of human resources within Karub Enerji Sanayi ve Ticaret A.Ş. (the "Company" or "Karub Enerji"), and to build and maintain a qualified, competent and highly committed workforce capable of achieving the strategic objectives of the Company, which operates in the field of renewable energy technologies.

The Policy aims to ensure that human resources practices are lawful, predictable and applied equally and consistently to all employees.

1.2 Scope

This Policy covers all employees, managers, interns and apprentices working at the Company's head office and branch workplaces and in its production, R&D, field and project organisations, employees under fixed-term and indefinite-term employment contracts and — to the extent relevant — subcontractor employees, personnel under temporary employment relationships and consultants providing services on behalf of the Company.

1.3 Legal Basis

This Policy has been prepared on the basis of the legislation in force, in particular the following regulations, and the international initiatives to which the Company is a party:

- Labour Law No. 4857 and its secondary legislation
- Provisions of the Turkish Code of Obligations No. 6098 on service contracts (Art. 393 et seq.), in particular the employer's duty to protect the employee and his/her personality (Art. 417)
- Law No. 6356 on Trade Unions and Collective Labour Agreements
- Law No. 5510 on Social Insurance and General Health Insurance
- Occupational Health and Safety Law No. 6331
- Law No. 6698 on the Protection of Personal Data ("KVKK") and the decisions of the Personal Data Protection Board
- Law No. 6701 on the Human Rights and Equality Institution of Türkiye
- Law No. 5378 on Persons with Disabilities
- Fundamental conventions of the International Labour Organization (ILO) (Conventions No. 29, 87, 98, 100, 105, 111, 138, 155, 182 and 190)
- Human Rights and Labour Standards principles of the United Nations Global Compact

– United Nations Guiding Principles on Business and Human Rights (UNGPR)

1.4 Fundamental Principles

The Company adopts the following fundamental principles in human resources management:

- ◆ **Merit and equal opportunity:** All human resources decisions are based on the knowledge, skills, competencies, experience and performance criteria required by the job.
- ◆ **Lawfulness:** All processes are carried out in full compliance with the applicable labour, social security and personal data protection legislation.
- ◆ **Respect for human dignity:** The personal rights, privacy and dignity of employees are protected under all circumstances.
- ◆ **Transparency and predictability:** The criteria for remuneration, career, performance and disciplinary processes are put in writing and communicated to employees.
- ◆ **Continuous development:** The professional and personal development of employees is regarded as an integral part of the Company's technology-driven growth strategy.
- ◆ **Participation:** Channels are established and operated through which employees can freely communicate their views, suggestions and complaints.
- ◆ **Industrial peace:** Freedom of association and the right to collective bargaining are respected; no discrimination is made on trade union grounds.

1.5 Recruitment and Placement

- ◆ Recruitment processes are conducted on the basis of the job description and competency matrix of the advertised position.
- ◆ Objective tools such as structured interviews, technical assessments, competency inventories and reference checks are used in candidate evaluation.
- ◆ No discriminatory criteria based on language, race, colour, sex, disability, political opinion, philosophical belief, religion, sect, age, marital status, pregnancy, sexual orientation or similar grounds are used in job advertisements or at the selection and placement stages.
- ◆ Only personal data that is necessary and proportionate for recruitment purposes is requested from candidates; candidates are informed in accordance with KVKK Art. 10, and special categories of personal data are processed only where a legal ground exists.
- ◆ Child labour and forced or compulsory labour are not tolerated under any circumstances; the legal provisions on the minimum working age and ILO Conventions No. 138 and 182 are complied with.
- ◆ No recruitment fee, commission or similar payment is requested from any employee or candidate; identity and travel documents are not confiscated.
- ◆ The obligations regarding the employment of persons with disabilities and former convicts under Article 30 of Law No. 4857 are fully met; accessibility and reasonable accommodation measures are taken.
- ◆ An orientation programme is provided to every new employee; information is given on the job description, occupational health and safety training, the code of ethics and information security obligations.

1.6

**Employment Contract, Working Hours and Remuneration**

- ◆ A written employment contract with content compliant with the legislation is concluded with all employees; a copy of the contract is delivered to the employee.
- ◆ Working hours, overtime, rest breaks, weekly rest days, national and public holidays and annual paid leave are administered and recorded in accordance with the provisions of Law No. 4857.
- ◆ Overtime is applied with due regard to the annual upper limit prescribed by law (270 hours) and with the employee's consent; it is fully compensated in wages or in time off in lieu.
- ◆ Wages are never below the minimum wage and are determined on the basis of the level of responsibility of the position, market data, internal equity and performance.
- ◆ The principle of equal pay for work of equal value is applied; no wage discrimination is made on any ground, including sex in particular.
- ◆ Wages and fringe benefits are paid on time, through a bank and after statutory deductions; payslips are made available to employees.
- ◆ Wage information is kept confidential and shared only with those who need to know.
- ◆ Flexible working, remote working and balancing arrangements are implemented to the extent the nature of the work allows and through written arrangements compliant with the legislation.

1.7

**Performance Management and Career Development**

- ◆ Performance management is a structured process based on measurable objectives set at the beginning of the year and competency assessment, applied at least once a year.
- ◆ Evaluation results are shared with the employee in a one-to-one meeting; strengths and development areas are identified jointly and an individual development plan is drawn up.
- ◆ Priority is given to internal resources in promotions, job changes and lateral transfers; open positions are announced through internal postings wherever possible.
- ◆ Succession planning and talent pool activities are carried out for critical positions.
- ◆ Objections to evaluation results may be submitted in writing to the Human Resources Department and are resolved within a reasonable time.

1.8

**Training and Competency Development**

- ◆ The annual training plan is prepared on the basis of the needs analyses of department managers and the outputs of performance evaluations.
- ◆ Training on occupational health and safety, environment, information security, personal data protection, the code of ethics and anti-corruption is mandatory for all employees.
- ◆ Production and R&D personnel are provided with vocational training on photovoltaic technologies, energy storage systems, product safety, quality standards and the relevant technical standards.
- ◆ Training records are kept, training effectiveness is measured and the plan is reviewed every year.
- ◆ Higher education, certification and vocational qualification processes are supported within the framework of the established procedures and principles.

1.9



Employee Relations, Communication and Grievance Mechanism

- ◆ Employees may communicate their views, suggestions, requests and complaints directly to their managers, to the Human Resources Department or to the Company's Ethics Hotline.
- ◆ Reports are handled confidentially; no retaliation of any kind may be taken against an employee who makes a report.
- ◆ Mobbing (psychological harassment at the workplace), sexual harassment, violence and any form of ill-treatment are strictly prohibited; such allegations are investigated as a priority and without delay.
- ◆ Employee satisfaction and engagement surveys are conducted at regular intervals; the results are translated into action plans.
- ◆ The rights to trade union organisation and collective bargaining are respected; dialogue with trade union representatives is conducted in good faith.

1.10



Disciplinary Process and Termination of the Employment Contract

- ◆ The disciplinary process is conducted with due regard to the principles of the right of defence, proportionality, equal treatment and the presumption of innocence.
- ◆ No disciplinary sanction is imposed on an employee without first obtaining his/her written defence.
- ◆ In termination proceedings, the procedures and principles of termination under Law No. 4857 and the provisions on notice and severance pay and other statutory rights are fully complied with.
- ◆ Exit interviews are held with departing employees; the findings are evaluated for the purpose of corporate improvement.
- ◆ The confidentiality and non-competition obligations of departing employees and the return of Company assets are handled through written processes.

1.11



Protection of Employees' Personal Data

The personal data of employees and candidates is processed in accordance with the KVKK and the relevant secondary legislation and the Company's Personal Data Protection and Privacy Policy, in line with the principles of lawfulness, purpose limitation, proportionality and limitation to the retention period. Employees are informed at the recruitment stage and regularly thereafter; data subject requests are answered within the periods prescribed by the legislation. Personnel files are kept in a manner that protects them against unauthorised access.

1.12



Responsibilities

- ◆ **Board of Directors:** Approves the Policy, allocates the necessary resources and oversees implementation at the highest level.
- ◆ **General Manager / Senior Management:** Ensures that the Policy is adopted across the Company and aligned with strategic objectives.
- ◆ **Human Resources Department:** Responsible for preparing, updating, implementing, monitoring and reporting on the Policy.
- ◆ **Department Managers:** Ensure that the Policy is implemented within their own teams; demonstrate a fair, consistent and non-discriminatory management approach.
- ◆ **Employees:** Are obliged to comply with the Policy, report violations and attend mandatory training.

1.13



Monitoring, Review and Entry into Force

The implementation of this Policy is monitored through indicators such as time to hire, voluntary and total turnover rate, training hours per person, internal promotion rate, employee engagement score, number of complaints and resolution time. The Policy is reviewed at least once a year or immediately in the event of a change in legislation or a significant organisational change. The Policy enters into force upon approval by the Board of Directors and is communicated to all employees through the Company's internal communication channels.

PREPARED BY

Legal and Compliance Department

Name – Surname / Signature / Date

APPROVED BY

Board of Directors

Name – Surname / Signature / Date