

As MODERATOM, our Social Compliance policy includes the standards we create by working together with all our employees, based on our basic principles and values, with teamwork. Our goal is to ensure that MODERATOM Social Compliance Policy becomes the company culture. For this reason, social compliance standards have been established and started to be implemented. In addition to providing products and services with social compliance standards, this policy aims to give employees all their rights arising from the standards within the framework of the law, to comply with occupational health and safety rules, to be sensitive to the environment, to realize the goals of creating a workplace environment where open and honest communication between employees is respected and valued commits. The social compliance policy is announced to all our employees through on-the-job training. Within the scope of this policy, no sanctions or penal actions are taken against employees who express their concerns, concerns and complaints, and 'notification boxes' are used to express these concerns and concerns. Employees can express all their opinions, requests, complaints and suggestions clearly in the boxes, these are evaluated by the Senior Management and necessary improvement activities are carried out for areas open to improvement. Continuous development activities are carried out in accordance with the regulations required by law and notifications from personnel.

The Social Compliance Policy includes the following components:

- Forced Labor (Voluntary Labor)
- Child Labor (Underage Workers)
- Discrimination (Egalitarian Approach)
- Working Hours and Wages (Wage / Salary / Payments)
- Health and Safety
- Engagement with Society and Stakeholders
- Foreign National Employees
- Human Trafficking
- Rest Days and Holidays

- Recruitment and Employment
- Employment Agreement (Employer Agreement)
- Labor Discipline
- Environmental and Occupational Health and Safety Issues
- Compliance with Customs Legislation
- Respect for the Right to Organize, Union and Collective Bargaining (Freedom of Association)
- Complying with Ethical Principles
- Listening and Evaluating Requests and Complaints

1. **Forced Labor (Voluntary Labor):**

Our business prohibits all forms of forced labor, including apprenticeships, bonded labor, military or slave labor, and all forms of human trafficking. It is not possible to work outside the working hours (overtime/overtime) specified in the law. Overtime work cannot be done without the employee's consent. If the employee quits the job, the company cannot prevent or postpone it except for any security reason. All kinds of information of our employees are protected and kept confidential to the extent specified by law.

2. **Child Labor (Underage Workers):**

Our business adheres to the minimum age provisions of applicable laws and regulations. Our workplace prohibits anyone under the age of 18 from working in all positions. Our workplace's ban on child labor complies with the Labor Law, Occupational Health and Safety Law, other legal regulations and International Labor Organization standards.

3. **Discrimination (Egalitarian Approach):**

Our business values all its employees and the contributions they make. It has a deep-rooted stance against discrimination and a deep-rooted commitment to ensuring equal opportunity. As management, we strive to maintain our organization as an institution where there is no discrimination or physical or verbal harassment on the basis of race, gender, color, nationality, social origin, language, religion, age, disability, political opinion, immigrant worker or any other value status protected by applicable laws. We are determined. Personnel selection for our workplace is made based on minimum qualifications such as open position, education, interests, talent and work experience.

4. Working Hours and Wages (Wage / Salary / Payments):

Our workplace pays its employees competitive wages based on the industry and local labor market. Our practices are carried out in full compliance with applicable laws and employment contracts regarding wages, working hours, overtime and fringe benefits. We offer our employees opportunities to develop their skills and capacities and support these efforts by providing promotion opportunities whenever possible.

5. Health and Safety:

Our company ensures the creation and protection of a safe and healthy workplace environment. As a company, we aim to ensure continuity by creating a work environment where our employees can work safely, healthily and efficiently by minimizing the risk of exposure to accidents, injuries and all kinds of factors that threaten health. Our company provides a workplace environment free of violence, pressure, harassment, threats and disturbing conditions.

6. Engagement with Society and Stakeholders:

Our company is committed to establishing a bond with its stakeholders on the basis of good faith by listening to their opinions, obtaining information from their opinions and taking their opinions into consideration. In this context, by determining employee representatives in accordance with the legal legislation, it creates an environment where employees can discuss their problems with the representatives and allows them to report them in writing to the notification boxes. It is committed to establishing a dialogue with its stakeholders, when appropriate, on workplace-related and workplace rights issues within its sphere of influence.

7. Human Trafficking:

Our company cannot employ illegal workers.

8. Rest Days and Holidays:

Our employees cannot be deprived of rest and holiday days within the framework of their legal rights. Although it varies depending on the department, employees who work six days a week are given one day off, or employees who work five days a week are given a two-day holiday.

9. Recruitment and Employment:

Vacant positions needed by the company management are determined and employment is carried out by the company management in accordance with the law and within the framework of certain rules (egalitarian approach, leave, wage, holiday, employment contract, etc.)

10. Employment Agreement (Employer Agreements):

An "Employment Contract" is prepared between our company and the person to be employed, in accordance with the workplace and the law, and containing the conditions offered to the candidate personnel. Personnel who accept to start working are required to sign "Employment Contract, Confidentiality Agreement, Overtime Consent and Security Systems Communiqué, KVKK Documents, OHS Instruction". All these rules and regulations are conveyed to the relevant personnel through orientation training.

11. Labor Discipline

In order to ensure disciplined work by our company, the disciplinary rules determined by the disciplinary board are applied.

12. Environmental and Occupational Health and Safety Issues

As MODERATOM, one of our goals is to ensure Environmental and Occupational Health and Safety to the maximum extent. To ensure the safety of life, property and the environment by minimizing the risks that our environment and all parties affected by our activities may be exposed to; Our priorities include meeting and improving legal requirements, raising awareness on this issue, and ensuring that our understanding of social responsibility is understood in society, including our customers.

13. Compliance with Customs Legislation

We comply with all applicable local and international legislation regarding customs and take measures that are compatible with these legislations and prevent the illegal shipment of products.

14. Complying with Ethical Principles:

To comply with all laws and regulations that we are subject to, to keep transparent and up-to-date records to prove compliance with the relevant regulations, and not to tolerate any form of corruption and bribery in our Company; As MODERATOM, we undertake not to give or receive bribes and/or gifts for the purpose of gaining profit or

facilitating business, to establish the necessary mechanisms and policies to combat corruption and bribery, to avoid situations that may create a conflict of interest, and to protect the intellectual property rights of business partners.

15. Wishes and Complaints:

To establish the necessary complaint and suggestion mechanism for each employee to convey their wishes and complaints, to ensure that the employee works in a happy environment by providing timely and effective evaluation and feedback, to ensure that there is no retaliation for the wishes, suggestions and complaints made by the employee, To address complaints regarding noise, waste, etc.); As MODERATOM, we are committed to encouraging the use of the complaint and suggestion mechanism, as well as in communicating complaints from workers.

REQUEST SUGGESTION COMPLAINT PROCEDURE

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1. PURPOSE

The purpose of this procedure is to determine the evaluation and finalization of the complaints, wishes and suggestions of our employees and everyone we communicate with in our organization and the process to be applied.

2. SCOPE

This procedure covers the activities of receiving applications related to complaints and wishes and suggestions, investigating the actions and persons subject to the complaint, and evaluating the complaints, wishes and suggestions in our organization based on the wishes, suggestions, complaints and feedback received.

3. RESPONSIBILITIES

3.1. SUPERIOR ADMINISTRATION

The necessary resources needed for the process of handling wishes, suggestions and complaints in an effective and efficient manner

Identifying and securing resources. Regularly review the effectiveness of the process for handling Wishes, Suggestions and Complaints.

3.2. SOCIAL COMPLIANCE REPRESENTATIVE:

- Establish, implement and maintain the processes and procedures for the handling of Wishes, Suggestions and Complaints.
- Reporting to senior management at regular intervals (every 6 months) through management review meetings on the performance of the process of handling Wishes, Suggestions and Complaints.

3.3 HUMAN RESOURCES OFFICER

- To work in cooperation with the employer's representative, employee representatives in the investigation of wishes, suggestions and complaints
- Acting as the employer representative when the employer representative is not present in the company

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3.4. EMPLOYEE REPRESENTATIVE / SOCIAL COMPLIANCE EMPLOYEE REPRESENTATIVE AND SOCIAL COMPLIANCE BOARD

- To work in partnership with the employer representative and human resources officer in all processes of listening to, investigating and finalizing wishes, suggestions and complaints.
- The Social Compliance Committee meets once a month to discuss and decide on, among other things, wishes, suggestions and complaints.

4. IMPLEMENTATION

MODERATOM handles and monitors wishes, suggestions and complaints in accordance with the following principles, and ensures continuous improvement of the employee satisfaction management system by evaluating the data obtained.

4.1. CONTACT:

The employer representative is primarily responsible for the evaluation of Wishes, Suggestions and Complaints. The collection center of the Wish, Suggestion and Complaint is the employer representative. When the Wish, Suggestion and Complaint is first evaluated, it is recorded and started to be investigated. The investigation is carried out jointly by the employer representative, employee representative / social compliance employee representative and human resources officer.

4.2. RECEIVING COMPLAINTS AND SUGGESTIONS:

SURVEYS: "EMPLOYEE SATISFACTION SURVEY" has been prepared at MODERATOM. It is conducted at least once a year, the question why is asked in the surveys and the sections to write explanations are prepared as available.

WISH AND COMPLAINT SUGGESTION BOX: Complaints or Suggestions are delivered to the Employer representative by throwing them into the Wish / Suggestion Complaint box.

- The Wish / Complaint Suggestion Box is hung on the outside wall of the women's locker room at the exit of the cafeteria. (It is in a secluded place away from cameras, etc.)
- The Wish/Complaint Suggestion box is checked once a month (generally the first week of the relevant month).
- The Social Compliance Representative has the keys to the box.

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FACE-TO-FACE Grievance: If the employee wishes, they can go to Human Resources, Employee representatives or the Social Compliance Representative to raise their grievance face-to-face. This grievance is placed on the agenda on the day the committee meets.

Anonymous Complaint Method: Complaints or suggestions can be left anonymously in the wish and complaint box. Anonymous complaints will be taken into consideration and processed. The area where the wish, complaint and suggestion boxes are located is outside the field of view of the cameras. It can be written on any paper and thrown away, and it is not required to be letter headed or logoed. Employer Representative, Employee and Social Compliance Employee Representatives, Human Resources Responsible, the complaint of the employee who stipulates that his/her name be kept confidential is accepted anonymously. Incoming complaints are recorded (including verbal complaints) by the employer representative. The result of the complaint is announced on the notice board. If the complainant declares that he/she does not want his/her complaint to be posted on the notice board, only he/she will be notified.

WhatsApp Employee Representative Complaint and Suggestion line: It consists of social compliance employer representative, Employee Representatives, Social Compliance Employee Representatives and Human Resources Responsible. Our staff can submit their complaints and suggestions via the WhatsApp Complaint and Suggestion line through Employee Representatives.

The urgency of complaints made in the following situations is considered to be of high importance

- Problems that stop the complainants' production and/or working efficiency
- Quality problems leading to loss of production and yield
- Problems that put human health at risk
- Continuously communicated problems related to the same issue
- Complaints about gender discrimination

4.3. INITIAL EVALUATION OF THE COMPLAINT:

The grievances thrown into the Wish, Suggestion and Complaint box are opened once a month and checked by the employer representative. In addition, in cases requiring urgent solutions, the complainant may fill out the "Complaint FORM" and submit it to the employer representative, Employee / Social Compliance Employee representative or human resources officer. Following the initial evaluation (if available), urgent solution proposals are communicated to the complainants. If the proposed solution is accepted by the grievor, the grievance is reported and the grievance is

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directed/closed accordingly. Interviews with the complainant are conducted with a certain level of courtesy. Personal information of the complainant is not disclosed without their consent.

4.3.1 INITIAL EVALUATION OF THE SUGGESTION:

Suggestions and requests placed in the Wish, Suggestion and Complaint box are opened once a month and checked by the employer representative. The employee representative accompanies him/her, and if the suggestion owner wishes, he/she can fill out the "Complaint FORM" and submit it to the employer representative, the Employee / Social Compliance Employee representative or the human resources officer. Following the initial evaluation of the suggestion/request, the suggestion is reported to senior management. Interviews with the Suggestion Owner are conducted with a certain courtesy. Personal information of the Suggestion Owner is not disclosed without their consent.

4.4. INVESTIGATION OF THE GRIEVANCE:

If a quick solution cannot be found regarding the grievance, the Employer Representative, Employee Representative / Social Compliance Employee Representative or Human Resources Officer conducts the necessary interviews and examinations in order to conduct on-site inspections of the complainant... The Employer Representative prepares the report in the light of this information and submits it to senior management. Grievances that remain open are continued to be monitored during the evaluation periods and the complaint is closed if it is not repeated within 1 year from the date of the complaint. Regarding Suggestions and Wishes, the senior management decides on the actions that the company can take and the actions to be taken for the relevant wish and suggestion are announced to all employees on the company bulletin board.

4.5 REPORTING:

The employer's representative informs and evaluates the complaints and suggestions at least every 6 months. He/she may organize a meeting in the factory regarding complaints or suggestions and share the situation of the previous period with the participants.

4.6. MEASURING THE LEVEL OF SATISFACTION WITH THE PROCESS OF HANDLING COMPLAINTS AND SUGGESTIONS

MODERATOM organizes a survey to determine the satisfaction level of complainants or suggestion owners. The results of the survey are evaluated by the Employer's representative and Corrective/Preventive Actions may be initiated for nonconformities identified. In addition, the level of satisfaction is measured by sharing the situation of the previous

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period with the participants in two-way complaint and suggestion listening meetings not less than once a year. Surveys, survey evaluations and actions taken are discussed/evaluated at regular meetings.

4.7. EVALUATION OF EMPLOYEE SATISFACTION SURVEYS

Employee satisfaction surveys are conducted at least once a year under the organization of the Employer Representative. The Human Resources Officer and Employee Representative act jointly.

4.8. STORAGE OF RECORDS

MODERATOM keeps all records of employee complaints for 2 years...

OCCUPATIONAL HEALTH AND SAFETY POLICY

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MODERATOM considers human beings as the most valuable asset in the conduct of its activities and considers the health of its employees and ensuring that its employees work in a healthy and safe environment among its top priorities within the framework of its sustainability policies.

Our Occupational Health and Safety policy consists of the following elements:

- Complying with legal legislation and regulations regarding occupational health and safety.
- Providing training to our employees on occupational health and safety, ensuring that they gain competencies and increase their personal awareness.
- To take all precautions against hazards such as fire, injury and disease that pose a danger to life and property safety and to supervise the applicability of the studies carried out on this subject and to make the necessary updates.
- To provide a safe, healthy and ergonomic workplace environment for employees by conducting risk assessments to reduce and eliminate the risk of occupational accidents and occupational diseases in the workplace.
- To improve existing investments to minimize occupational health and safety risks.
- To consider occupational health and safety and legal regulations when realizing new investments.
- To respect the environment and Quality Management Systems legislation; to ensure traceability within the company by establishing relevant systems for this purpose.
- To make continuous improvements by using appropriate technological equipment related to occupational health and safety.



HUMAN RIGHTS POLICY

The purpose of the Human Rights Policy is to reflect the principles MODERATOM has adopted regarding human rights and to provide a guideline for its employees and business partners.

This policy is based on;

- The Constitution of the Republic of Turkey,
- Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, UN Convention on the Rights of Persons with Disabilities and Convention on the Rights of the Child,
- ILO (International Labour Organization) Conventions to which Turkey is a party,
- United Nations Principles on Business and Human Rights,
- United Nations Global Principles,
- OECD (Organization for Economic Co-operation and Development) Principles for Multinational Enterprises

We are committed to abide by the following principles and fulfill our duties to ensure the wholehearted commitment to these principles in our ecosystem in order to ensure compliance with the national legislation on working life and to demonstrate an attitude committed to the fundamental rights and freedoms guaranteed by the Constitution.

PRINCIPLES

1. Respect and Compliance with Human Rights

Based on mutual respect in all its relationships, MODERATOM strives to act in accordance with human rights in its relations with its employees, customers, business partners, competitors and the communities in which it operates, to encourage them to be sensitive in this regard and to prevent human rights violations.

2. Equal Opportunity, Diversity and Inclusion

A working environment where employees feel fully included, regardless of their differences, and observe each other's rights and dignity in all their behaviors.

Decisions on recruitment, placement, career development, training, remuneration and promotion are based on the employee's qualifications, performance, skills and experience. In this system, where performance and contribution to corporate success are recognized, cultural diversity and equal opportunity are encouraged. Diversity in the workforce

is essential for the Company to achieve its goals. Therefore, MODERATOM strives to attract, develop and retain talents with different backgrounds and experiences, who respect differences, are open-minded and tolerant.

3. Discrimination

Everyone working at MODERATOM benefits equally from the rights and freedoms recognized by law. In line with the Diversity and Inclusion Policy, there shall be no discrimination based on age, gender, race, color, language, religion, philosophical and political views, ethnic origin, economic status, sexual orientation, health status, disability, appearance, dress or lifestyle. Discriminatory behavior, action or retaliation of any kind will not be tolerated.

4. Right to Collective Bargaining and Freedom of Association

The right of workers to collective bargaining and freedom of association shall be respected.

5. Freedom of Expression

It adopts the principle of preventing any situation that may hinder employees from exercising their right to freedom of expression in the work environment, and provides the necessary tools and environments for employees to express themselves freely.

6. Occupational Health and Safety

The protection of the health and safety of employees and of visitors or business partners who are present for any reason at MODERATOM's workplace and/or work areas is among MODERATOM's top priorities. For this reason, the company management strives to ensure the highest safety standards to prevent potential hazards in the workplace.

In order to create a safe and healthy workplace, it is essential to comply with applicable occupational health and safety legislation and internal requirements. MODERATOM works to provide and maintain a healthy and productive workplace environment by regularly identifying and resolving risks that may cause accidents, injuries and health problems in the Occupational Health and Safety Committee.

7. Forced Labor

Employees are not allowed to be employed against their will. No employee shall be subjected to pressure in any matter, and all employees shall be employed in appropriate positions with their own consent under equal conditions.

8. Child Labor

In accordance with the principle of no child labor set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, MODERATOM does not employ child labor.

9. Violence and Mistreatment

MODERATOM is committed to providing a safe work environment for all employees and treats them with respect and human dignity. Employees are also obliged not to use physical or psychological violence or mistreatment against anyone, regardless of the reason, and not to condone such behavior by others. This includes threats of violence and ill-treatment or attempts to intimidate or instill fear, even if no action is taken. MODERATOM does not tolerate any form of physical, verbal, sexual or psychological harassment, abuse or intimidation.

10. Working Hours, Remuneration and Personal Rights

MODERATOM conducts its operations in compliance with applicable laws on wages, working hours, over time and benefits. MODERATOM works to increase the productivity of employees during working hours, aims to prevent over time work and supports the balance between work and private life.

MODERATOM encourages the creation of a productive and motivating work environment that continuously supports development in the workplace, personal development opportunities, training investments, recognition and reward programs that support success, exemplary behavior, innovation and creativity.

Human Resources Policy

Our Human Resources vision is to build a family of good people, good citizens who have reached a high level of consciousness and responsibility, employees who are specialized and mastered in their work, and employees who have adopted the discipline of work, even to the level of passion, and to make MODERATOM a strong employee brand whose mission is respected.

Recruitment Policy

Our recruitment policy is to bring potential and talented human resources to our company by using tools and techniques that will provide equal opportunity to candidates and enable them to be employed in the most appropriate way. In this context, according to the nature of the relevant position; candidates we reach from various sources are included in the evaluation processes and interviews determined according to the position.

Orientation Policy

Our orientation process aims to ensure that our new employees embrace MODERATOM's values and are ready to start their duties. During this process, our employees are informed about MODERATOM's vision, mission, values and way of doing business and receive all the technical training required for their duties.

Training Policy

We consider the training of our employees as an important element of our company's development and continuously invest in our human resources. Our training policy is to support our employees with tailor-made trainings to ensure that they continue their duties with high motivation and performance. With this approach, our employees are provided with personal development trainings and technical trainings to improve their job/position-specific expertise and ways of doing business.

Equal Opportunity Policy

Equal opportunity is the basis of our code of ethics, human resources policies and practices. Discrimination based on gender, ethnic origin, etc. is absolutely unacceptable in our company. No employee may propagandize his/her religious and political views at work or prioritize these views in his/her decisions. In the face of problems such as gender inequality, mobbing and sexual harassment in our workplaces, all our employees can report to the Human Resources Directorate without revealing their identities.

Ethical Principles Compliance Policy

All our employees are obliged to comply with our code of ethics. Within the scope of the orientation program applied to our employees when they start work; our ethical principles, what they can do to support compliance with ethical rules within the company, Disciplinary and Ethical rules, Disciplinary and Ethical rules by making them sign the Instruction, explaining what may happen when ethical and disciplinary rules are not followed, and the application forms and the processes applied in case of violation of ethical rules are conveyed in detail verbally and in writing.

Fee Policy

The remuneration policy implemented at MODERATOM is designed to ensure that our company is competitive in the labor market and to encourage the sustainable performance of our employees. Within the scope of this policy, our company has a remuneration system based on business values and managed through a tier structure. The components of the remuneration system vary depending on the position, grade, market value of the position, individual performance, qualifications, inflation development and sector conditions.

Compensation Policy

Our compensation policy has been established with reference to the provisions of the Labor Law No. 4857 in force. Within this framework;

- Severance Pay is paid to the employee whose service contract is terminated according to one of the conditions requiring the payment of severance pay specified in the Labor Law No. 4857 and who has worked for at least one year in our company or to the legal heirs in case of death of the employee; within the framework of the legal severance pay ceiling based on the employee's working period and wage.
- In accordance with Article 17 of the Labor Law No. 4857, the employee is notified of the termination of the employment contract, and the employee is given job search leave for the periods stipulated in the law according to the seniority of the employee or the wage until the end of the notice period is paid in cash.

In order to protect our environment and ensure its continuity, we comply with all environmental laws and directives, to continuously improve our environmental performance by reducing these effects by keeping environmental impacts under control and to realize all product production activities of this awareness with 'Operational Business Excellence' and to leave a livable clean environment for future generations.

As an organization that is aware of the fact that sustainable growth, which we place on the main axis of our activities, is possible as long as we maintain the principles of sustainable environment and energy;

- To use natural resources efficiently, to increase recycling and recovery,
- To take into account energy-efficient and environmentally friendly technologies while creating all processes from the design stage,
- Develop and implement energy efficiency projects that will have a positive impact on climate change,
- Purchasing energy efficient products, services and technologies, and supporting high performance designs,
- To create health, safety and environmental integrity by reducing emergency risks that may occur within the framework of occupational health and safety rules,
- To evaluate recycling and reuse alternatives by reducing waste that may be generated as a result of production, transportation, storage, operation, treatment and maintenance activities,
- To improve our environmental management system to continuously improve our environmental performance,
- To consider environmental impacts in plant and process design,
- To ensure that wastes are taken under control and disposed of in a way that does not harm the environment,
- Control air emissions to prevent air pollution,

We declare and undertake.



**WE ARE SENSITIVE TO OUR
ENVIRONMENT**

1.PURPOSE

This procedure enables us to determine the operating systems of our company, with the aim of protecting child labor and caring for young people, determining their health and safety, physical, mental, formal and social development, or the principles of their working methods, without compromising their details, and preventing their economic exploitation.

2. SCOPE

This procedure encompasses all candidates applying to MODERATOM, as well as all employees working in the workplace.

3. REFERENCES

Labor Law No. 4857

Customer Social Compliance Standards

ILO Conventions No. 138 and 182

4. DEFINITIONS

Young Worker: An individual who has completed the age of 15 but has not yet reached the age of 18.

Child Labor: The utilization of individuals who have not yet completed the age of 15 in the workforce.

5. RESPONSIBILITIES

Human Resources Manager: Approves the procedure for preventing child labor and employing young workers. Social Compliance Representative: Prepares, revises when necessary, and ensures the implementation of the procedure for preventing child labor and employing young workers.

6. IMPLEMENTATION**6.1. Principles of Employing Young Workers**

The safety, health, physical, mental, moral, and psychosocial development, as well as personal inclinations and abilities of young workers, are considered during their placement and throughout their employment. Young workers can be employed in positions that do not hinder their school attendance, academic success, or participation in

preparations for career choices or vocational training approved by the Ministry of National Education. Employers must ensure the protection of young workers against any risks that may jeopardize their development, health, and safety due to their lack of experience, ignorance of existing or potential risks, or incomplete development.

6.2. Working Hours and Break Times

The working hours of young workers are limited to 8 hours per day and 40 hours per week. Overtime is not permitted for young workers. The daily working hours of young workers are applied considering a continuous rest period of 14 hours within a 24-hour time frame. During the educational period of young workers, working hours can be a maximum of 2 hours per day and 10 hours per week, outside of school hours. During periods when school is closed, working hours cannot exceed the specified working hours in the first paragraph. A break of 30 minutes for work lasting more than two hours but less than four hours and a break in the middle of working hours for work lasting four to seven and a half hours are mandatory.

6.3. Instances Excluded from Daily Working Hours In addition to the instances

- Excluded from Daily Working Hours In addition to the instances excluded from working hours according to Article 66 of Labor Law No. 4857: Time spent on training provided by the employer,
- Time spent in courses and meetings sent outside the workplace by the employer, as well as time spent in vocational training programs organized by authorized institutions and organizations,
- Time spent by young workers in conferences, congresses, commissions, and similar meetings organized by national and international institutions and organizations, for which they cannot continue their work, is considered as part of working hours.

6.4. Weekly Leave

The weekly leave allowances for young workers cannot be less than 40 consecutive hours. Additionally, the weekly leave pay is provided without any work obligation.

6.5. National Holidays and General Holidays

Young workers cannot be employed on national holidays and general holidays. Additionally, payments related to these days are made without any work obligation.

6.6. Granting of Annual Paid Leave

The annual paid leave period for young workers cannot be less than 20 days. The uninterrupted use of annual paid leave is essential. However, upon the request of the young worker, it can be split into two periods, especially if it is

beneficial. Annual paid leave for young workers attending school or education is given during the periods when schools are on vacation, and there is no participation in courses and other training programs.

6.7.Labor Contract and Documentation Obligation

Employer;

- Informs the parent or guardian of the young worker about the work to be performed by the young worker, the risks he/she may face and the measures taken.
- Before starting to employ a young worker who is still in school, he/she shall ask for proof that he/she is a student. He/she shall keep this document in his/her personal file.
- The employer is obliged to conclude a written employment contract with the parent or guardian of the young worker.

6.8. Employer's Training and Other Obligations

The employer shall provide the young worker with the necessary on-the-job training on the risks at the workplace, adaptation to the work, legal rights and the nature of the work before the young worker starts work. In cases where there is a need for a change in working conditions before or during the employment of the young worker, the employer should take into consideration the following issues in order to make this change;

- . Suitability and organization of the workplace and the place where the work is carried out,
- The shape and order of the work equipment used and how they are used,
- Work organizations,
- The level of training and instruction provided to young workers.

If the assessment identifies a risk to the physical or mental development and safety of young workers, the necessary medical checks should be carried out as soon as possible.

6.9. Monitoring and Surveillance of Child Labor

MODERATOM requests a copy of the identity card from the person accepted for employment and checks the information on the job application form and the information on the copy of the identity card during the recruitment of the young worker.

A copy of the identity photocopies is kept in the personnel file.

6.10. Actions to be Taken in Case of Identifying Child Labor

MODERATOM does not use child labor under any circumstances. If a child laborer is detected, he/she is quickly removed from the company or production area and the Human Resources Department is notified. The child is kept in the meeting room or counseling area and handed over to his/her parent or guardian. A separate training plan is made and followed for the child. In addition, all educational expenses until the age of 16 are covered by the company or the family is provided with employment opportunities.

6.11. Prevention of Child Abuse

If there is a child laborer in the company or enterprise, he/she is protected against all kinds of abuse. If abuse is detected, the provisions of the Disciplinary Regulation shall apply.

7. REPORTING**8. FILING**

Employee Record File