



Human Rights Policy

25.07.2022, Izmir

Sunel is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

This Policy applies to all employees of Sunel and subsidiaries. In addition, our subcontractors working at our sites are expected to comply with this Policy.

If any employee believes that someone is violating the Human Rights Policy or the law, they are asked to report it immediately to their manager or Human Resources department.

Sunel seeks to identify, assess and manage human rights impacts within our value chain in line with the following policy aims:

Child labour

Sunel respect Children's Rights. Child labour is not used. There is no recruitment of child labour. If any incidence of child labour is identified in the supplier's industry and region, the supplier shall initiate, or participate in, a programme to transfer any children involved in child labour into quality education until they are no longer children. No one under eighteen years old is employed at night or in hazardous work or conditions. In this Code, "child" means anyone under fifteen years of age, unless national or local law stipulates a higher mandatory school leaving or minimum working age, in which case the higher age shall apply; and "child labour" means any work by a child or young person, unless it is considered acceptable under the ILO Minimum Age Convention 1973 (C138).

Employment relationship

Sunel recognizes the importance of secure employment for both the individual and for society through a preference for permanent, open ended and direct employment. Sunel shall take full responsibility for all work being performed under the appropriate legal framework and, in particular, shall not seek to avoid obligations of the employer to dependent workers by disguising what would otherwise be an employment relationship or through the excessive use of temporary or agency labour



Fair wages/compensation

Sunel give workers remuneration which satisfies their basic needs and those of the members of their family who are directly dependent on them.

Forced/bonded labour

Sunel have zero tolerance for modern slavery, forced labour and human trafficking, and will ensure our operations are free from these practices. We will work with our business partners and suppliers to influence the elimination of modern slavery, forced labour and human trafficking. We are proactively and progressively engaging with our supply chain on each of these issues.

Freedom of association/collective bargaining

The rights of the employees to choose to be a member of a trade union and to bargain collectively as permitted by local laws and regulations must not be interfered with or restricted. In situations or countries in which the rights regarding freedom of association and collective bargaining are restricted by law, parallel means to freedom of association and collective bargaining must be facilitated for all personnel by the vendor.

Health and safety

Nobody should ever be at greater risk because they work for us. Everybody has the right to go home in the same state as they come to work. Members of the public are also entitled to expect us to make sure our activities do not harm them. We are committed to eliminating the risk of serious harm from all our activities, and to keeping our people healthy. Sunel business must design and execute its work so that safety and health are planned in from day one – for everyone.

Migrant workers

We expect all workers, including imported and migrant workers, to be provided wages, benefits and working conditions that are fair and in accordance with local law. We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. We review these policies in detail during our audit process and expect our vendors to share these views and comply

No harsh or inhuman treatment /Harassment



Employees of Sunel shall be treated with dignity and in accordance with the Sunel policy of maintaining a work environment free of all forms of harassment, whether physical, verbal or psychological.

Non-discrimination

Sunel respect each individual's human rights and will not discriminate on the basis of race, colour, religion, creed, sex, age, social status, family origin, physical or mental disability or sexual orientation, nor will we commit other violations of human rights. Such discrimination will not be tolerated. We will be resolute in upholding human rights in everything we do and will not tolerate such discrimination in others. Ignorance and inaction do not constitute excuses for discrimination.

Working conditions, including hours

We will treat all employees fairly and honestly regardless of where they work. All staff will have a written contract of employment, with agreed terms and conditions, including notice periods on both sides. All staff are entitled to reasonable rest breaks, access to toilets, rest facilities and portable water at their place of work, and holiday leave in accordance with the legislation of the country where they work. All employees are provided with appropriate job skills training.

Exploitation of children

Sunel condemns all forms of exploitation of children. The Company does not recruit child labor, and supports the elimination of exploitative child labor. Sunel also supports laws duly enacted to prevent and punish the crime of sexual exploitation of children. Sunel will work to raise awareness concerning such exploitation, and will cooperate with law enforcement authorities to address any such instances of exploitation of which the Company becomes aware.

Human Rights Due Diligence

Recognizing the United Nations Guiding Principles of Business and Human Rights, we are striving to conduct human rights due diligence. Considering the impacts human rights violation can cause, we will prioritize appropriate actions to identify, prevent or mitigate those impacts in our value chains. Where we identify that we have caused or directly contributed to adverse human rights impacts, we would engage in appropriate remediation processes by ourselves or in cooperation with other stakeholders.



As Sunel, we will;

- Continuously **IDENTIFY** the adverse social, labour and environmental risks and impacts affecting people in our operations and supply chains;
- act on findings to prevent and mitigate risks, taking a risk-based approach to **PRIORITIZE** where to focus;
- **RESPOND** to and remediate adverse impacts;
- **MEASURE** progress over time; and
- account for, or **REPORT** on, how we are addressing the identified risks and impacts.



We believe our main responsibilities lie in a number of critical areas: child labour/minimum age workers/worst forms of child labour, employee rights, the right to access finance for vulnerable and disadvantaged members of the community and the risk of human rights violations within our supply chain.

Sunel adheres to national law and regulation in each market in which it operates. Where Sunel faces conflicts between internationally recognized human rights and national laws, the company will follow processes that seek ways to honour the principles of international human rights.

In addition to working with respect for human rights, we pursue opportunities to support human rights where we can make a positive impact.

Sunel seeks to improve its human rights performance by referencing and implementing key international principles such as the United Nations Guiding Principles on Business and Human Rights, as well as relevant international conventions and standards such as those of the International Labor Organization.