

**ECZACIBAŐI MONROL NÜKLEER ÜRÜNLER SANAYİ VE
TİCARET ANONİM ŐİRKETİ**

**ECZACIBAŐI GROUP
OCCUPATIONAL HEALTH AND SAFETY POLICY**

Version 0.1

1 September 2023

1. PURPOSE AND SCOPE

The Eczacıbaşı Group¹ is committed to treating occupational health and safety (“OHS”) as a core responsibility. Accordingly, it strives to fulfil its legal and social responsibilities in this field through the engagement of all relevant parties, including workers, suppliers, contractors, apprentices, and visitors, based on legal regulations and related management system standards.

Every Group company is expected to take preventive action against unsafe behaviours and situations that could lead to work accidents and occupational diseases in order to eliminate or minimize potential hazards.

This Occupational Health and Safety Policy (Policy) has been prepared to regulate the general principles and commitments adopted by the Eczacıbaşı Group on occupational health and safety (OHS) and covers all Eczacıbaşı Group companies.

2. GENERAL PRINCIPLES AND COMMITMENTS

The Eczacıbaşı Group is committed to providing a safe and healthy work environment for its workers and every stakeholder with whom it interacts, to continuously improving its OHS performance, and to complying with all applicable legislation and requirements that its companies are subject to in their respective areas of operations. Aware of its duties towards its employees, society and stakeholders, the Group carries out activities aimed at ensuring a safe and healthy work environment. To this end, Group companies require all stakeholders in the field to comply with health and safety rules and contribute to their improvement.

With the aim of ensuring occupational health and safety rules at all workplaces and operations, all Eczacıbaşı Group companies shall:

- Take measures proactively to eliminate at their source all hazards that may lead to work accidents and occupational diseases.
 - Adopt a preventive approach, conduct periodic risk analyses, and assess all available opportunities to plan, implement, develop, and continuously improve OHS measures.
 - Undertake to comply with all legal requirements and occupational health and safety obligations.
 - Embrace continuous development that considers not only legislative requirements but also technological and sectoral innovations that respond to the expectations of workers and stakeholders.
 - Create an environment that engages workers in OHS processes and encourages consultation. Companies shall consult workers and worker representatives at every level of the organization during the planning, implementation, performance assessment and improvement of their OHS management systems.

¹ The “Eczacıbaşı Group” or the “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

- Provide all the personal protective equipment needed and make use of safe equipment and appropriate technologies.
- Engage in activities aimed at enhancing the occupational health and safety culture across the Group and within the company.
- Organize training for workers on how to protect themselves against accidents, injuries, diseases and how to use their personal protective equipment properly.
- Monitor workers' health, considering their exposure to health and safety risks at the workplace.
- Ensure the continuity of their occupational health and safety management system while continuously improving it with new technology, best practices from within and without the organization, suggestions and recommendations received from relevant parties/stakeholders, new knowledge and understanding about occupational health and safety, and new skills and competencies.
- Contribute to society's health and safety through the production technologies employed and products created.
- Monitor and prioritize the implementation of certification processes that help to improve occupational health and safety processes.
- Collaborate with external stakeholders to improve their OHS performance.
- Conduct internal control and external audits to improve OHS processes.
- Embrace behaviour-oriented occupational health and safety management.
- Set, monitor, and analyse key performance indicators (KPIs).
- Ensure that all workers, contractors, visitors, and apprentices increase their awareness of occupational health and safety through briefings and training.
- Consider and manage OHS risks when planning new investments or changes to existing investments.
- Develop, create, and implement action plans and effective communication for possible emergencies and risks and periodically review their efficiency.
- Monitor suppliers' and contractors' compliance with the principles set out in this Policy.

3. IMPLEMENTATION RESPONSIBILITY

This Policy was drawn up by the Eczacıbaşı Group Occupational Health & Safety Committee and Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force with the approval of Eczacıbaşı Holding Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units shall assume responsibility for implementation in their respective areas of responsibility. Monitoring of

Policy implementation in Group companies is carried out by the Eczacıbaşı Holding ESG Committee and Group companies' Internal Control and Compliance Teams. The Board of Directors of Group companies may delegate their authority and responsibilities on environmental matters to people they have authorized within the company by following the procedures and principles of relevant legislation. In such a case, the Board of Directors provides high-level supervision and oversight of the persons to whom their authorities and responsibilities are delegated.

4. POLICY REVIEW

This Policy shall be reviewed and assessed on an annual basis. If there is a significant change in the organization's practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted as by Eczacıbaşı Group Occupational Health and Safety Committee and Sustainability, Corporate and Government Affairs as necessary. The changes made in the Policy will enter into force following the approval of the Board of Directors.

5. SUGGESTION AND COMPLAINTS

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (*Virtual Compliance Officer*) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to uyum@eczacibasi.com.tr via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviours and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviours violating the norms of this Policy shall not be exposed to retaliatory behaviour and attitudes.