



HUMAN RIGHTS POLICY

Document Number:	0A-İHP.01
Revision Number:	00
Revision date:	00
Yayın Tarihi:	05.01.2023
Page Number:	03

1. Purpose and Scope

MCL Bentonit Mining Logistics Ind. Trade. Ltd. operates with a focus on productivity and sustainability. It adopts an approach that respects human rights for its employees and all stakeholders involved in its business relationships, aiming to uphold basic human rights throughout society. The company adheres to the principles of the United Nations Global Compact. In this context, MCL Bentonit Mining Logistics Ind. Trade. Ltd. has established its Human Rights Policy (Policy).

1.1 The Policy is based on the Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

1.2 The Policy covers employees, business partners, and suppliers, and MCL Bentonit Mining Logistics Ind. Trade. Ltd. communicates and includes the principles stated in the Policy in annual training sessions for its employees. The company encourages its business partners and suppliers to comply with the principles outlined in the Policy and incorporates them into contracts.

1.3 The Policy was adopted by the General Assembly on January 5, 2023, and became effective.

2. Principles, Commitments, and Relevant Practices

Under the Policy, MCL Bentonit Mining Logistics Ind. Trade. Ltd. is committed to:

2.1 Respect for Human Rights

In accordance with the Universal Declaration of Human Rights, the company respects universal human rights in the countries where it operates and aims to prevent human rights violations. It also respects the rights of local populations in the countries of operation, referring to the United Nations Declaration on the Rights of Indigenous Peoples.

2.2 Equal Opportunities, Respect for Diversity

The company demonstrates an equal attitude without discrimination based on gender, language, religion, race, ethnic origin, sexual orientation, nationality, age, pregnancy, marital status, union membership, political views, and similar issues in human resources processes and the working environment. It values diversity in its organizational structure.

2.3 Collective Bargaining and Freedom of Association



HUMAN RIGHTS POLICY

Document Number:	0A-İHP.01
Revision Number:	00
Revision date:	00
Yayın Tarihi:	05.01.2023
Page Number:	03

The company respects the right to collective bargaining and freedom of association for its employees.

2.4 Freedom of Expression

MCL Bentonit Mining Logistics Ind. Trade. Ltd. is committed to preventing any situation that would hinder employees' freedom of expression in the workplace.

2.5 Healthy and Safe Working Conditions

The company prioritizes providing conditions and a working environment where all employees can work safely and satisfactorily. It operates with the goal of "zero accidents" in all activities, ensuring full compliance with international principles on Occupational Health and Safety (OSH) and national laws and regulations. It also commits to providing good practices beyond legal requirements.

2.6 Prevention of Harassment

The company does not tolerate incidents of harassment, bullying, or any form of mistreatment in the workplace.

2.7 Forced Labor and Human Trafficking

MCL Bentonit Mining Logistics Ind. Trade. Ltd. strictly prohibits forced labor and human trafficking.

2.8 Child Labor

In line with the principles of the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the company prohibits the employment of child labor.

2.9 Acts Constituting Crimes

The company does not engage in activities in the countries of operation that could result in crimes or human rights violations. It expects its employees to show sensitivity in the same direction.

2.10 Stakeholder Feedback

The company values feedback and opinions from stakeholders regarding the Policy. Feedback on the Policy and potential violations and non-compliances are reported within the company through an open-door policy, directly to management personnel, or through the



HUMAN RIGHTS POLICY

Document Number:	0A-İHP.01
Revision Number:	00
Revision date:	00
Yayın Tarihi:	05.01.2023
Page Number:	03

suggestion and complaint box at the contact number (452) 400 19 39 or the email address info@mclbentonite.com.

3. Compliance, Monitoring, Audit, and Reporting

3.1 The responsibility for the Human Rights Policy lies with the CEO at the highest level.

3.2 The Board of Directors of the Company is responsible for overseeing compliance with the human rights policy, rules, and regulations, including the establishment and operation of notification, investigation, and sanction mechanisms in case of non-compliance.

3.3 MCL Bentonit Mining Logistics Ind. Trade. Ltd. identifies potential human rights issues arising from its activities and works to reduce and prevent these effects if they have a negative impact. In case of a risk to human rights, authorities are contacted to take necessary measures.

3.4 A system is established to keep the identity of the whistleblower confidential for reporting violations of the Policy.

3.5 The Policy is reviewed by the Ethics Committee every two years, and the implementation of the Policy is monitored. In case of feedback from stakeholders, the Committee quickly takes action to review the Policy.

4. Resolution of Policy Non-Compliance

4.1 Mechanisms, both formal and informal, are developed by MCL Bentonit Mining Logistics Ind. Trade. Ltd. to redress human rights violations within the scope of the Policy.

4.2 The Ethics Committee may seek expert opinion if deemed necessary and, during the investigation, take measures that do not violate principles of confidentiality, benefiting from experts. All information and documents requested by the Ethics Committee are provided. All employees are obliged to assist the Ethics Committee in this regard.

No retaliation is taken against any employee expressing concerns under the Policy, and reports are handled through processes that protect confidentiality. Non-compliance with the Policy may result in disciplinary action or legal measures.

5. Effectiveness

The Policy comes into effect on January 5, 2023.

6. Public Disclosure



HUMAN RIGHTS POLICY

Document Number:	0A-İHP.01
Revision Number:	00
Revision date:	00
Yayın Tarihi:	05.01.2023
Page Number:	03

It is mandatory to disclose the Policy to all stakeholders and the public. The Policy has been shared with all employees, business partners, suppliers, and the public. The same obligations apply in case of any changes to the Policy.