

HUMAN RIGHTS POLICY

1. PURPOSE AND SCOPE

NMGlobal Kıymetli Madenler Ticaret A.Ş. (“NMGlobal” or “Company”) strives to ensure that fundamental human rights are respected across the community by putting respect to human rights at the core of any engagement with its employees and business partners in a manner which is aligned to both national and international regulations as well as the Company’s ethical principles and values during its activities.

This Policy draws upon international regulations and national laws, including in particular the Constitution of the Republic of Turkey, the Universal Declaration of Human Rights¹ (1948), the International Covenant on Economic, Social and Cultural Rights (1966), the International Covenant on Civil and Political Rights (1966), the UN Global Compact², the UN Convention on the Rights of the Child, the International Labour Organization (ILO) Conventions, the ILO Declaration on Fundamental Principles and Rights at Work, Worst Forms of Child Labour Convention (ILO Convention no. 182), the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

This Human Rights Policy (“Policy”) has been drawn up to set out the principles and approach of NMGlobal to human rights. NMGlobal expects its internal and external stakeholders to act in accordance with this Policy.

2. DEFINITIONS

External Stakeholder: Individuals or organizations that are directly or indirectly affected by or affect the operations of a business. This category can include many different groups, such as customers, suppliers, government agencies, regulators, investors, the community, the media and non-governmental organizations.

Internal Stakeholder: Any person, group or related/affiliated organization (if any) within the Company which affects or is affected by the Company. (E.g. employees, all managers including the board of directors.)

Business Partners: Other businesses or individuals that a business works with to carry out its operations. This category may include many different groups, such as customers, suppliers, government agencies, regulatory bodies, investors, the community, the media, and non-governmental organizations.

Human Rights: Rights inherent to all human beings, regardless of any difference which may include but is not limited to gender, religion, language, race, age, nationality, sexual orientation, pregnancy, difference of thought, political view, and wealth.

The UN Global Compact: The 10 principles of the UN Global Compact are derived from universally recognized declarations in the areas of human rights, labor, the environment, and anti-corruption.

ILO: International Labour Organization

Worst Forms of Child Labour Convention: It refers to the Convention No. 182 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, adopted by the ILO in 1999, which aims to eliminate the worst forms of child labour. The Worst Forms of Child Labour Convention requires member countries to take immediate and effective measures to ensure the prohibition and elimination of the worst forms of child labour as a

matter of urgency and governs the measures to be taken.

ILO Declaration on Fundamental Principles and Rights at Work: It refers to the ILO Declaration adopted in 1998, which states that all member countries, even if they have not ratified the relevant conventions, are obliged to respect, develop and implement the five basic principles set out in these Conventions and listed below, in good faith and as a requirement of the Constitution

- freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced or compulsory labor;
- the effective abolition of child labor; and
- the elimination of discrimination in respect of employment and occupation.
- A safe and healthy working environment

Retaliation: Any type of adverse action taken by an employer against an employee in order to dissuade that employee from raising an actual or potential violation to the employer or from fulfilling their legal obligation to report a such violation.

3. PRINCIPLES, COMMITMENTS AND RELEVANT PRACTISES

The Company respects universal human rights and is committed to preventing violations of human rights in accordance with all applicable laws.

Opposing any action that is against human rights, including but not limited to any forms of torture, forced labor, child labor, and worst forms of child labor, other gross human rights violations and abuses such as widespread sexual violence, war crimes, crimes against humanity, racism, and discrimination, the Company is committed to upholding human rights in line with its corporate principles and its responsibilities under both and national and international regulations.

NMGGlobal, adheres to the principles listed below while conducting its commercial activities:

3.1. Employment

The Company pays strict attention to ensure that its activities are not associated with:

- Worst forms of child labor, forced or compulsory labor, slavery, human trafficking, or
- discrimination in employment or occupation or discrimination towards minorities, other vulnerable groups or women, and adopts a “zero tolerance” to such practices.

3.2. Equal Opportunity, Respecting Differences and Diversity

Both during its human resources processes such as remuneration, employment, career, personal and professional development and within the work environment, the Company treats its employees on a fair and equal basis without making any discrimination based on gender, language, religion, race, ethnic origin, age, sexual orientation, gender identity or expression, nationality, marital status, personal status, pregnancy,

disability, genetic information or on any other arbitrary basis which is not associated with an employee's performance at work, union membership, political view or other similar factors. The Company respects diversity and views it as a key element of the Company's organizational structure.

3.3. Operating in Accordance with Legal Regulations

The Company complies with the legislation of all countries in which it has operations. It does not engage in any actions that may result in crime or violation of rights, and does not tolerate anyone in this regard. It expects all stakeholders to comply with the legislation applicable in their respective countries.

3.4. Right to Collective Bargaining, Freedom of Association and Organization

The Company respects the freedom of association, assembly and organization, and the collective bargaining rights of employees.

3.5. Prevention of Harassment, Mobbing, ill-treatment, and Violence

NMGlobal does not tolerate incidents such as harassment, mobbing, maltreatment and violence toward employees and adopts a "zero tolerance" approach against such incidents.

3.6. Freedom of Expression

The Company strives to eliminate any barriers that may prevent the employees from exercising their freedom of expression at work and provides an appropriate environment so that employees can express themselves.

3.7. Healthy and Safe Work

One of the top priorities of the Company is to provide an appropriate work environment and conditions which allow all employees to do their job in a safe, healthy, and happy manner. The Company takes all necessary measures to minimize the risk of accident and injury as part of its "zero accident" goal during all of its activities. The Company ensures complete compliance with national legislation and international principles regarding occupational health and safety (OHS).

3.8. Ethics

Built on the core values of "respect for people", "respect for human rights" and "closeness to the people", the Company acts with the awareness of its corporate social responsibility and expects all stakeholders to act in accordance with its ethical principles.

4. Authority and Responsibilities

4.1. At the Board of Directors are responsible for enforcing the Human Rights Policy.

4.2. The Board is also responsible for identifying and operating the notification, review and enforcement

mechanisms where the human rights policy, rules and regulations are not followed.

4.3. NMGlobal takes into consideration the possible human rights issues which may arise during its operations and the groups that could be affected the most by these issues. Where human rights are adversely affected, the Company tries to reduce and prevent such adverse effects. If a human right risk is present, necessary measures are taken by engaging with related authorities.

4.4. The Legal and Compliance Department is responsible for monitoring the implementation of the Policy

4.5. Grievance mechanisms are developed according to this Policy to prevent violation of rights which may result from the Company's activities.

4.6. All employees and managers of NMGlobal are responsible for complying with this Policy and implementing and supporting the relevant procedures of NMGlobal. NMGlobal expects its external stakeholders and business partners to act in accordance with this Policy.

4.7. There will be no retaliation against any employee who voices their concerns according to this Policy, and their feedback will be handled without violating confidentiality.

5. Stakeholder Feedbacks

We value and pay attention to any feedback and opinions of stakeholders on this Policy. Feedback on, and violations of, this Policy can be communicated through any of the following channels. We comply with the personal data protection laws when handling such feedback.

E-mail : etik@nmglobal.com.tr

Address : İkitelli OSB Mah. Atatürk Bulvarı No:114 İç Kapı No:236 Başakşehir İstanbul/Türkiye

Phone : +90 212 886 09 68

6. Enforcement

This Policy is announced to all stakeholders in Turkish and English by publishing it on nmglobal.com.tr. The Policy is updated when necessary by the Legal and Compliance Units and comes into effect with the approval of the Board of Directors.

This Policy has been put into force following the approval of the Board of Directors on 01.10.2025

Date of Board of Directors' Decision	Version No
05.07.2022	(1)
01.10.2025	(2)