



**GLOVIS TURKEY
HUMAN RIGHTS CHARTER**

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1. OBJECTIVE AND SCOPE

1.1. Purpose of Establishing the Human Rights Charter

GLOVIS TURKEY declares this Charter of Human Rights to actively implement human rights management and at the same time to prevent human rights violations and mitigate related risks. In order to implement human rights management, GLOVIS TURKEY respects and supports a wide range of recognized human rights/labor-related international standards and guidelines, such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labor Organization Constitution, OECD Guidelines for Multinational Enterprises and OECD Due Diligence Guidance for responsible Business Conduct, among others. GLOVIS TURKEY will identify and strive to prevent and mitigate the negative effects of business activities on human rights, and establish remedial procedures to minimize the damaging effects on human rights.

1.2. Scope of Application of the Human Rights Charter

This Human Rights Charter applies to all officers and employees (including those working in irregular positions) of GLOVIS TURKEY, including domestic and foreign production and sales entities, subsidiaries, second-tier subsidiaries, and joint ventures. In addition, officers and employees of GLOVIS TURKEY follow this Human Rights Charter when collaborating with suppliers, sales and service organizations, and further encourage all stakeholders in a business relationship to respect this Human Rights Charter. If any matter covered by this Charter conflicts with any local national laws and regulations, local laws and regulations shall prevail. GLOVIS TURKEY may amend this Human Rights Charter to reflect the laws and industrial characteristics required by the relevant country, and may establish separate detailed policies, if necessary. All officers and employees of GLOVIS TURKEY shall perform their duties in accordance with this Human Rights Charter, unless there are special provisions in the laws and regulations of the relevant country or the articles of association or company regulations of the organization.

2. EXECUTION

2.1 Introduction

2.1.1 Implementation of the Policy and Relevant Legislation

Human Rights Risk Management System

GLOVIS TURKEY should establish an internal system necessary for implementing the human rights management in accordance with this Human Rights Charter to respect the human rights of all officers and employees and relieve the ensuing risk, and should also establish a human rights due diligence policy to regularly evaluate and improve human rights and sufficiently share such results with stakeholders. The department in charge of human rights management for GLOVIS TURKEY carries out the human rights risk management system in accordance with the principle of good faith and due

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diligence, and reviews matters to be considered for human rights management procedure on a regular basis, actively reflecting social changes to revise the management system.



Language

This Charter is written in both Turkish and English. In the event of discrepancy between the two versions, Turkish version shall prevail.

2.2. Basic Principle

Article 1 Prohibition of Child Labor and Force Labor

GLOVIS TURKEY prohibits child labor, and adheres to the zero-tolerance principle for such unfair employment. It takes measures so that minors’ opportunity for education will not be restricted due to their work. GLOVIS TURKEY does not force any of its officers and employees to work against their free will, for example by engaging in any act of violence, threat, false imprisonment or the like against any officer or employee, and does not keep original copies of personal ID cards or visas for the purpose of forced labor.

Article 2 Prohibition of Discrimination and Workplace Harassment

GLOVIS TURKEY will not discriminate against any and all officers and employees in relation to employment, such as recruitment, hiring, promotion, education, wages, welfare benefits, etc., on the ground of their gender, race, ethnicity, nationality, religion, disability, age, marital status or pregnancy, family status, social status, political opinion, etc., without reasonable grounds, and shall establish an organizational culture that respects the diversity of officers and employees. In addition, GLOVIS TURKEY prohibits officers and employees from causing physical or mental suffering or worsening the working environment, through coercive work orders, verbal abuse or the like by using his/her position or relationship in the workplace.

Article 3 Compliance with Working Conditions

GLOVIS TURKEY shall comply with the statutory working hours of each country in which it operates its business, and shall pay reasonable remuneration for service to all officers and employees, together with payroll statements. GLOVIS TURKEY does not demand any commission or brokerage

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fee from the employee on the grounds of employment. In addition, GLOVIS TURKEY will provide all officers and employees with sufficient educational opportunities and a working environment appropriate for the performance of their duties to develop their capabilities and improve their quality of life.

Article 4 Humane Treatment

GLOVIS TURKEY respects the privacy of officers and employees and fully protects personal information and it does not abuse, mentally or physically, or adversely treat any officer or employee.

Article 5 Guarantee of the Freedom of Association and Collective Bargaining

GLOVIS TURKEY respects the labor relations laws of the country where this Human Rights Charter is applied to, and provides sufficient opportunity for communication to all officers and employees.

Article 6 Guarantee of Industrial Safety

GLOVIS TURKEY regularly inspects the facilities, equipment, tools and others of the business premises so that all officers and employees may work in a safe working environment, and prepares appropriate measures to prevent physical and mental risks and support measures for follow-up management.

Article 7 Protection of the Human Rights of Local Residents

All officers and employees of GLOVIS TURKEY are cautioned not to violate the human rights of the local residents when carrying out their work, and shall make efforts to protect the rights to safety and health and freedom of residence of local residents. Moreover, GLOVIS TURKEY does not discriminate against vulnerable groups such as children, migrant workers, the disabled and women and protects their human rights.

Article 8 Protection of the Human Rights for Customers

All officers and employees of GLOVIS TURKEY must endeavor to protect the life, health, property, personal information collected from management activities of customers when providing products and services.

Article 9 Responsible Supply Chain Management

In order to establish a sustainable supply chain, GLOVIS TURKEY evaluates and manages ESG risks arising from the supply chain, and conducts education and support activities for suppliers to prevent risks in advance.

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Article 10 Guarantee of Environmental Rights

GLOVIS TURKEY recognizes that environmental pollution can be a serious violation of human rights that directly affects people's lives and health, and establishes environmental management policies and guidelines to minimize negative environmental impacts caused by business activities.

2.3. Establishment Of The System

A. Establishment of Governance

① Responsibility of Human Rights Management

GLOVIS TURKEY should manage and supervise the status of promoting the human rights management through committees or management meetings attended by the highest decision makers or decision makers of major departments, and working-level meetings organized by decision makers of the department in charge of human rights management. The roles and responsibilities of committees, management meetings, or working-level meetings may include 1) review of the enactment or amendment of the Human Rights Charter, 2) suggestion of opinions on amendment of relevant internal regulations, such as the HR system, employment regulations, audit standards etc, 3) implementation of human rights risk evaluation and recommendation of measures to be taken as a result thereof, 4) instruction to investigate cases of human rights violations and deliberation on remedial measures, and 5) other matters deemed necessary for the protection of human rights.

② Performance of Human Rights Management

GLOVIS TURKEY should have a department in charge of human rights management to carry out the relevant affairs. The tasks to be carried out by the department in charge of human rights management may include (i) enactment and amendment of the Human Rights Charter, (ii) establishment of an implementation plan for human rights management, (iii) evaluation and management of human rights risks, including the performance of human rights due diligence, (iv) operation of grievance procedures, (v) conducting internal training, and external communication.

B. Operation of the Grievance Procedure

③ Report and Reception of Violations of Human Rights

GLOVIS TURKEY should operate a channel to receive reports of human rights violations or human rights risks in the local language from officers, employees and other persons or organizations (reporters) who are victims of such violations or are aware of such violations. When receiving a report on human rights violations, the relevant departments, etc. shall discuss specific remedies for the cases of human rights violations, taking into account the characteristics of the individual reported cases.

Grievance Channel to Report Violations of Human Rights

- Name of department: Human Resources Department
- Person In Charge: HR Head of Department

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- E-mail: voice@glovis.com.tr

① Processing of Reports on Violations of Human Rights

GLOVIS TURKEY shall, with reference to court precedents, regulations of relevant government agencies, past internal practices and other industrial practices, strive to identify the best remedies with the assistance of the legal department. If human rights violations, etc. have a significant impact on the freedom and rights of victims or are likely to spread to the risk of corporate reputation, remedial measures shall be discussed in committees, management meetings, working-level meetings, etc. where the highest decision-maker, etc. participate.

② Guarantee of Status for Reporters

Officers and employees of all GLOVIS TURKEY must not disclose, reveal or otherwise report any personally identifiable information that may be used to identify a reporter. All information relating to victims, incidents, remedial procedures and outcomes, as transmitted during the reporting and notification process, must be kept strictly confidential. In addition, measures must be implemented to protect employees from adverse consequences arising from the reporting of human rights violations and risks.

C. Education and Efforts to Raise Awareness

① Human Rights Management Education

GLOVIS TURKEY will conduct human rights management education to promote the understanding of and improve the awareness of human rights of its officers and employees, and to communicate the direction of internal human rights management and action plans. Through the human rights management education, discriminatory acts by officers and employees are prohibited and active reporting of detected cases and risks of human rights violation is encouraged.

② Expansion of Human Rights Management

GLOVIS TURKEY may share information on the Human Rights Charter, its implementation plan, and the human rights risk evaluation process and associated outcomes with suppliers, when it is deemed necessary to manage human rights risks and encourage human rights management. Such content is shared via the optimal channels (voice, video and written media) and methods (Korean, English, etc.) for all organizational members to conveniently access information relating to human rights management.

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2.4. Human Rights Due Diligence

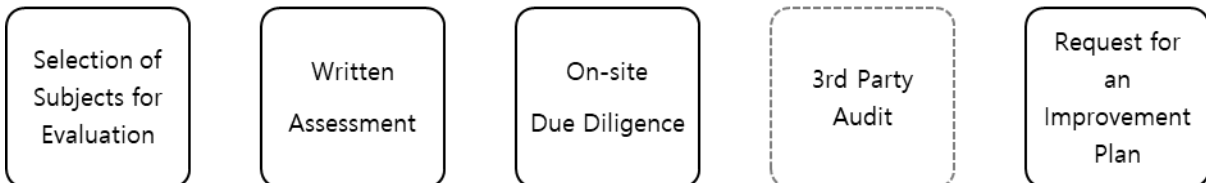
A. Evaluation of Risk

① Development of the Evaluation Index

GLOVIS TURKEY should develop and operate assessment and due diligence indicators to evaluate the working environment, working conditions, operation of human resources, industrial safety, and human rights risks of local residents and customers by reflecting the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance for Responsible Business Conduct, Guidelines on Business and Human Rights from the Ministry of Justice, and others based on the basic principles of this Charter.

② Operation of the Evaluation Process

GLOVIS TURKEY should operate a process to identify and evaluate the current status of human rights violations and the possibility of potential human rights risks by selecting evaluation subjects within the scope of the Charter. In the process, communicate with key stakeholders, identify human rights risk factors that may arise across business relationships, including business operations and supply chains, and evaluate their impact on stakeholders. The written assessment will be conducted by providing the evaluation index and guidelines to the evaluation subject, and it is recommended that the evaluation subject establish a self-improvement plan for insufficient matters derived from the self-diagnosis. Based on the results of the written assessment, GLOVIS TURKEY may conduct an on-site due diligence to confirm whether there is any risk by checking internal regulations and systems related to human rights, conducting interviews and conducting on-site inspections. In addition, in order to ensure the objectivity of the written assessment and on-site due diligence, a separate 3rd party audit may be conducted through an independent third party agency, and any "high-risk" and "non-conformity" items found and evaluated through the written assessment, on-site due diligence and 3rd party audit shall be required to be immediately improved or shall be required to establish improvement plans. GLOVIS TURKEY should review and revise the evaluation index and process for human rights risks on an annual basis in order to accurately find cases of human rights violations and efficiently operate the evaluation process.



B. Performance of Risk Improvement

① Formulation and Stipulation for Improvement

GLOVIS TURKEY should establish improvement plans and implementation plans for the human rights risks derived from the human rights risk evaluation. The organization that has undergone a human rights risk evaluation will consult with the department in charge of human rights management to come up with specific implementation tasks to implement the improvement plans.

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② Monitoring of the Implementation Status

GLOVIS TURKEY should continuously monitor whether the person in charge of the human rights risk-evaluated organization is diligently and effectively implementing the mutually agreed improvement plans. The implementation of detailed tasks is carried out on schedule, and the expected outputs are communicated with each other on a regular basis in order to secure them in a timely manner, and necessary measures may be taken if the improvement plans are not expected to be implemented.

C. Disclosure of Status and Outcome

① Report to the Key Decision Makers

GLOVIS TURKEY should report meaningful implications, important risks and improvement measures identified through human rights risk evaluation to the major decision makers, including the committees, management meetings, and working-level meetings. Reporting data approved by the committees, management meetings, major decision makers, etc. may be shared with the applicable departments and others to enhance the effectiveness of the promotion of human rights management.

② Information Disclosure

GLOVIS TURKEY will disclose information on cases of human rights infringement reports, human rights risk evaluation results, and measures to improve and mitigate risks through channels such as its website, integrated report, sustainable management report, or separate white paper on human rights, and select a disclosure channel that can be easily accessed and clearly understood by officers, employees, and other stakeholders.

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3. APPENDIX

A. Contact Information of the Person in Charge

<p>Grievance Channel to Report Violations of Human Rights</p> <ul style="list-style-type: none"> - Name of department: Human Resources Department - Person In Charge: HR Head of Department - E-mail: voice@glovis.com.tr

B. Reference

This Human Rights Charter has been established on the basis of human rights-related provisions, standards and initiatives specified under domestic and overseas human rights standards and pertinent laws and regulations.

- ① UN, Universal Declaration of Human Rights (1948)
- ② UNGC, A Human Rights Management Framework (2010)
- ③ UN, The UN Guiding Principles on Business and Human Rights (2011)
- ④ OECD, The OECD Guidelines for Multinational Enterprises (2011)
- ⑤ OECD, Due Diligence Guidance for Responsible Business Conduct (2018)
- ⑥ Constitution of the Republic of Korea
- ⑦ National Human Rights Commission of Korea, Manual of Human Rights Management for Public Institutions (2018)
- ⑧ National Human Rights Commission of Korea, Checklist for Human Rights Impact Assessment Operated by Institutions (Corporate enterprises) (2018)
- ⑨ Ministry of Justice, Guidelines on Business and Human Rights (2021)

4. DEFINITIONS AND ABBREVIATIONS