

GALSAN



Human Rights and Working Conditions Policy

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Human Rights and Working Conditions Policy

Purpose

This policy has been established to ensure respect for human rights throughout all Galsan operations, to create fair and safe working conditions, to protect disadvantaged groups, and to prevent human rights violations within the supply chain.

Scope

This policy applies to all employees, job applicants, suppliers, subcontractors, customers, local communities, and all stakeholders affected by our products and services.

Responsibilities

All individuals working on behalf of Galsan or contributing to value creation are responsible for adhering to this policy and its principles. The Corporate Social Responsibility Committee is responsible for overseeing the implementation, monitoring, and alignment of these principles with Galsan's expectations.

References

Galsan bases its approach on the following international standards, national laws, regulations, and conventions:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- Women's Empowerment Principles (WEPs)
- ILO Convention No. 182 on the Worst Forms of Child Labour
- German Supply Chain Act (LkSG)
- Constitution of the Republic of Türkiye and relevant national legislation (Laws No. 4857, 5510, 6356, 6098)





Galsan integrates its reliable, competent, and innovative corporate stance with strong ethical values across its organizational structure and all stakeholder relations. The company adopts respect for human rights, the protection of natural resources, and the efficient use of resources as fundamental principles. It values all approaches that promote social equity, protect the environment, and generate societal benefit.

We expect full compliance with our Corporate Social Responsibility Principles from all stakeholders seeking to collaborate with us.



HUMAN RIGHTS POLICY

Definitions

HUMAN RIGHTS

Human rights are the fundamental rights and freedoms to which every person is entitled solely by virtue of being human.

These rights aim to protect an individual's life, liberty, security, dignity, and well-being. Human rights are universal; they apply to everyone, are inherent, inalienable, and must be upheld without any form of discrimination. They ensure the protection of individuals' physical, psychological, and social needs and guarantee the preservation of human dignity.

Human rights form the foundation of a free, safe, and dignified life for all individuals. Safeguarding these rights is essential for the functioning of democratic societies, and violations of human rights may lead to social injustice and conflict.

Galsan has taken the following sources into consideration when developing its Human Rights Compliance Policy:

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- Women's Empowerment Principles (WEPs)
- ILO Convention No. 182 on the Worst Forms of Child Labour
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Corporate Social Responsibility Committee

The Corporate Social Responsibility Committee is responsible for ensuring that all processes are carried out in compliance with national and international laws and conventions, and for leading the continuous improvement of Galsan's Corporate Social Responsibility practices. The Committee is appointed by the Galsan Board of Directors.

Committee Members:

1. Committee Chair: Chairperson of the Galsan Board of Directors
2. Compliance and Business Ethics Officer: General Manager
3. Social Sustainability Officer: Human Resources Manager
4. Environmental Sustainability Officer: Quality Manager
5. Technological Sustainability Officer: Engineering Manager
6. Sustainability Risk Monitoring Officer: Systems Consultant



Established to oversee Galsan's Corporate Social Responsibility practices, the Corporate Social Responsibility Committee will lead efforts to communicate our Human Rights and Working Conditions Principles, manage the compliance process, promote continuous awareness, and evaluate all feedback received.



**OUR FUNDAMENTAL
HUMAN RIGHTS
PRINCIPLES AND
COMMITMENTS**

GALSAN

1. Our Fundamental Human Rights Principles and Commitments

1.1. Respect for Human Rights: We believe that every individual inherently possesses human dignity, and we base all our activities on full respect for human rights.

1.2. Full Compliance with Laws and Legal Requirements: Galsan complies fully with national legislation governing working life, particularly the Turkish Labour Law No. 4857, and adheres with great diligence to all applicable legal obligations.

1.3. Corporate Communication and Relations: We maintain a communication style with all stakeholders that aligns with our values and reflects our corporate identity. We expect all stakeholders to understand and uphold the concepts of trust and competence required by our company values.

1.4. Prevention of Discrimination and Equal Treatment: No discrimination is tolerated based on gender, language, religion, race, color, age, nationality, disability, political opinion, socioeconomic status, or any similar grounds.

1.5. Equality, Inclusiveness, and Protection of Disadvantaged Groups: Galsan defines equality not only as the absence of discrimination but also as the active support of disadvantaged groups. Accordingly:

1.6. Empowerment of Women and Gender Equality: We provide equal opportunities for women in recruitment, compensation, promotion, and training processes. We demonstrate zero tolerance for gender-based pay gaps, glass ceiling effects, or discriminatory practices. We protect the work-life balance of women employees and ensure strong mechanisms against harassment and violence.

1.7. Support for Employees with Disabilities: We promote the employment of individuals with disabilities. We ensure accessible work environments, appropriate equipment, and reasonable accommodations.

1.8. Young Employees, Recent Graduates, and Interns: We offer fair, safe, and development-oriented working conditions. We do not allow exploitation, forced labor, or unpaid mandatory work.

1.9. Protection of Migrant and Refugee Workers: We prevent any form of discrimination arising from cultural, linguistic, or national differences and adopt practices that facilitate their adaptation processes.

1.10. Socially and Economically Disadvantaged Groups: We support employment, training, and social responsibility projects that enhance equal opportunity.

1.11. Fair Recruitment and Working Conditions: Recruitment processes are based on merit. We reward success through fair and competitive compensation policies, as well as an effective and objective performance evaluation system.

1.12. Employee Development and Support: We aim to strengthen employee engagement by ensuring equal opportunities in appointments, promotions, rotations, and reward practices. We provide equal opportunities for training, guidance, and development. We create a working environment that promotes transparency, mutual respect, collaboration, and solidarity.

1. Our Fundamental Human Rights Principles and Commitments



1.13. Healthy and Safe Working Environment:

We provide clean, healthy, and safe working conditions for our employees. We conduct occupational health and safety risk assessments and implement emergency response plans. We protect employees' physical and psychological well-being and actively assign workplace health and safety service units.

1.14. Freedom of Association and Collective Bargaining:

We respect employees' trade union rights. No pressure, obstruction, or interference is permitted.

1.15. Prevention of Child Labour and Forced Labour:

Galsan does not employ workers under the age of 18. We strictly prohibit forced labor, coercion, debt bondage, and human trafficking in all forms.

1.16. Prohibition of Harassment, Violence, and Mobbing:

Any form of violence, harassment, sexual harassment, or mobbing is strictly prohibited. In case of violations, disciplinary mechanisms are activated immediately.

1.17. Protection of Personal Data:

We safeguard the confidentiality and privacy of the personal data of our employees and any individuals whose data reaches us within the scope of business activities.

A close-up photograph of a hand pouring water into a stream. The water is captured mid-pour, creating a dynamic splash with many small droplets. The background is a soft-focus natural setting with green foliage and a bright sun flare in the upper left corner, creating a warm, golden light. The overall mood is peaceful and emphasizes the natural world and water.

LAND, FOREST, AND WATER RIGHTS AND COMMUNITY PROTECTION

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2. Land, Forest, and Water Rights and Community Protection

2.1. Respect for Land Rights:

We ensure that our activities do not negatively impact the land rights, property, or living spaces of local communities. Land grabbing, forced expropriation, or the use of land without legal basis is strictly prohibited.

2.2. Protection of Forests and Natural Ecosystems:

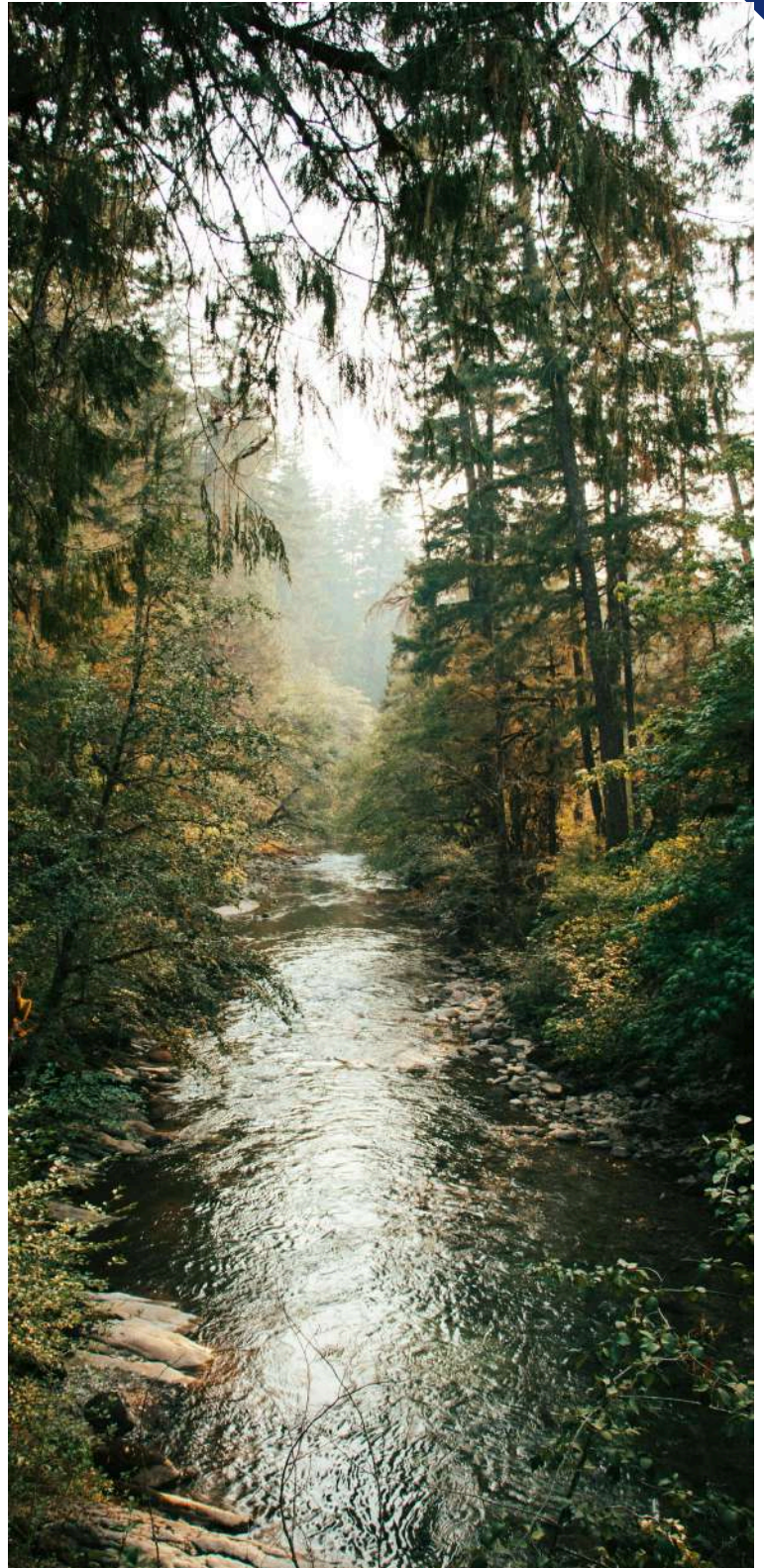
Before engaging in any activities that may harm forest areas, biodiversity, or ecosystems, environmental impact assessments are conducted, and necessary protection and restoration measures are implemented.

2.3. Water Rights:

We respect the right of local communities to safe and sufficient access to water. We apply sustainable water management practices to prevent excessive water consumption, pollution, or unfair use.

2.4. Protection Against Forced Eviction and Displacement:

Galsan does not permit any practices that may result in the forced displacement of individuals due to company operations or supply chain activities.



A close-up photograph of a hand pouring water into a pool, creating a large splash. The water is captured in mid-air, forming a complex, crystalline structure. The background is a soft, out-of-focus green, suggesting a natural setting like a forest or a garden. The lighting is warm and golden, likely from the sun being low in the sky, creating a bokeh effect with bright, circular light spots in the upper left corner.

USE OF PRIVATE AND PUBLIC SECURITY FORCES

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3. Use of Private and Public Security Forces

Security personnel operating within Galsan facilities shall:

3.1. Not use disproportionate or excessive force.

3.2. Not engage in any behavior that undermines or violates human dignity.

3.3. Not conduct unlawful searches, detentions, threats, or physical interventions.

3.4. Receive training on human rights principles and related standards.

3.5. External security service providers are required to comply with international human rights standards.



4. Supply Chain Human Rights Management

We expect full compliance from all our suppliers in the following areas:

- Respect for human rights
- Prevention of child labour and forced labour
- Fair and safe working conditions
- Non-discrimination
- Respect for environmental and community rights

We recommend that our suppliers review the Supply Chain Compliance Guide for Sustainability.



5. Compliance and Implementation

1. Complaint and Reporting Mechanism:

Confidential, secure, and retaliation-free reporting channels have been established for employees and all stakeholders. All violations are investigated by the Corporate Social Responsibility Committee. For complaints and reports, stakeholders may review the “Compliance and Concern Reporting (Anti-Retaliation and Whistleblowing) Policy and Principles” document and contact Galsan through the ethics hotline.

2. Disciplinary Actions and Sanctions:

In cases of human rights violations, the relevant authorities are notified. For violations committed by employees, necessary disciplinary procedures and legal sanctions are applied in accordance with the Turkish Labour Law No. 4857 and all applicable legislation.

In cases of supplier violations, the business relationship may be suspended or terminated.

3. Entry into Force and Review of the Policy:

This policy enters into force upon approval by the Board of Directors. It is reviewed annually and updated as necessary.



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Thank you for your interest and cooperation.

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