

HALK GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. HUMAN RIGHTS AND HUMAN RESOURCES POLICY

This policy outlines the commitment made by **Halk Gayrimenkul Yatırım OrtaklıĞı A.Ş.** (“**Halk GYO**”) to its responsibilities related to “Human Rights and Human Resources.”

- Human rights are the inviolable, inalienable and non-transferable rights and freedoms of all human beings.
- These rights apply to all human beings regardless of where or when they live. Everyone is equal in the rights.
- Human rights aim to protect and develop a person's personality.
- Human rights are based on the understanding that all human beings are born equal in terms of rights and dignity.

Halk GYO, in addition to the national legislation governing business life,

- Acts in compliance with the United Nations Declaration of Human Rights, to which our country is a signatory and which covers the fundamental principles of human rights and accountability.
- Respects employee rights in conformity with the guiding principles of the International Labour Organization (ILO), which has been accepted by our country, and operates by observing and taking into consideration issues such as discrimination, bans on forced labor, and the elimination of child labor.

1. EMPLOYEES

1.1 Human Resources Policy

Halk GYO bases its human resources practices on the following fundamental policies:

- Perform the activities Halk GYO needs to undertake to achieve its purposes with an adequate number of staff;
- Select and assign eligible staff with competencies that match the respective job requirements;
- Value and respect employees' personalities, protect their pecuniary and nonpecuniary rights, and ensure the confidentiality of their personal information;
- Offer a safe working environment suited to the nature of the assignment;
- To provide personnel with an environment and conditions in which they can utilize and develop their talents, professional development, and skills.

- To permanently establish an environment open to communication at all levels,
- Having personnel who embrace the company culture and corporate values and comply with the Ethical Principles,
- Ensure that employees work while adhering to the principles of productivity and profitability, and with the cost consciousness required,
- Encourage employees to produce new ideas that will help cultivate creative thinking and develop transactions/procedures.

1.2 Diversity Principle and Equal Opportunity

Given the principle of diversity, Halk GYO acknowledges that each person is different from one another.

Halk GYO provides equal opportunity to potential candidates in the recruitment and promotion processes of employees, based on the professional skills and competencies of each individual without discriminating on the basis of language, religion, race, denomination, ethnic origin, sex, personal choice, physical disabilities and so on.

1.3 Ban on Discrimination and Maltreatment

Halk GYO is obligated to take all the necessary measures to ensure that all actions that could lead to discrimination or constitute maltreatment are avoided/prevented.

Employees are obliged to avoid any and all kinds of acts/behavior aimed at each other at the work place and/or outside, which could lead to actions such as maltreatment, malicious and systematic psychological pressure/repression, discrimination, violation of personal space and harassment/abuse.

1.4 Training

Halk GYO organizes many in-class training and e-learning sessions on various topics/subjects in addition to professional training, to help contribute to the personal development of its employees. The e-learning training session on Human Rights is available to all employees.

2. RELATIONS WITH INVESTORS AND BUSINESS PARTNERS

In line with ethical principles and anti-corruption policies, equal, transparent, and reliable services are provided to all stakeholders.

Customer information is shared only with legal authorities and with explicit consent.

- Business relationships are not established with suppliers engaging in improper practices.

- Relationships with investors, partners, and all collaborating parties are transparent, fair, and based on trust.
- Actions are taken in accordance with ethical principles and anti-corruption policies.
- Information sharing is only carried out within the framework of legal regulations and with the consent of the relevant parties.
- Compliance with ethical and sustainability principles is expected from all collaborating parties.

3. SOCIAL RESPONSIBILITY

Halk GYO is considerate about the fragile segments of society and is conscientious about its social responsibility to society in all the activities it undertakes. Environmentally friendly practices and sustainability-focused approaches are adopted.

4. FEEDBACK AND SANCTIONS

Halk GYO is aware of the importance of a system that helps monitor and resolve the feedback coming from both internal and external sources. All internal and external stakeholders are entitled to provide feedback to the Ethical Practices Team (etik@halkgyo.com.tr) on this subject. Complaints about policy violations shall not be used against the complaining person(s), and are evaluated and concluded in accordance with the procedures. Administrative sanctions are taken against the stakeholders who violate the policy.

5. EFFECTIVE DATE AND REVIEW(S)

As per the Board of Directors' Resolution No. 1139 dated December 29, 2025, this policy has entered into force upon approval by Halk GYO's Board of Directors.

Halk Gayrimenkul Yatırım Ortaklığı A.Ş. Human Rights and Human Resources Policy is administered by the Directorate Human Resources, Administrative Affairs and Corporate Communication, on behalf of the Board of Directors and is reviewed every year and revised if necessary.