

# Human Rights & Working Conditions Policy

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## HUMAN RIGHTS & WORKING CONDITIONS POLICY

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI fully supports the United Nations Universal Declaration of Human Rights. We are committed to uphold fundamental human rights and respect those rights in conducting our operations throughout the world. In this document, Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI's commitment to the respect of Human Rights and Working Conditions is described in more detail.

This policy applies to all Gürfil A.S. and employees, all subsidiaries and joint ventures where Gürfil A.S. has operational control and to all subcontractors, working on the sites of Gürfil A.S.

In accordance with this Policy on Human Rights and Working Conditions, Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI fully supports the United Nations Universal Declaration of Human Rights and commits itself to respect all International Labour Organisation (ILO) core labor standards as set out below.

### 1. Banning of child labor

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI undertakes not to employ children in violation of conventions 138 and 182 of the ILO. In any case, Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI will apply the age of 18 as the minimum age for employment, except in the framework of internship- or vocational training programs, organized in co-operation with schools and training institutes or approved by the competent authority. Special care will be taken that these young people, with a minimum age of 15, are fully protected and have received adequate safety training and instructions.

### 2. Banning of forced labor

In accordance with ILO conventions 29 and 105, Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI will under no circumstances make use of forced or bonded labor, such as forced labor by persons placed in an institution, or compulsory labor including labor as a means of political coercion or education.

### 3. Freedom of association

Employees are allowed to communicate openly with management regarding working conditions and practices without fear of reprisal, intimidation or harassment.

The rights of employees to associate freely, to join or not to join trade unions, to collectively bargain, to seek representation and to join Workers' Committees are respected per applicable requirements.

### 4. Equal opportunities / Non-discrimination

In accordance to ILO convention 100 and 111, Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI is committed to an inclusive work culture and appreciates and recognizes that all people are unique and valuable and should be respected for their individual abilities. Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI does not accept any form of harassment or discrimination based on gender, religion, race, national or ethnic origin, cultural background, social group, disability, sexual orientation, marital status, age or political opinion.

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI shall provide equal employment opportunity and treat all employees fairly. Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI employees and business units shall only use merit, qualifications and other professional criteria as the basis for employee-related decisions in Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI, regarding for instance recruitment, training, compensation and promotion.

In countries that apply "positive action" programs or quota on certain minority groups Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI will follow the country legislation.

## 5. Remuneration

It is acknowledged and agreed that all employees of Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI are entitled to adequate remuneration (ILO Convention No. 100). Remuneration and all the other benefits are based on the principle of fairness and comply with the individual national legal standards or the standards of the national branches or company collective labor agreements, whichever is higher.

## 6. Working time and paid holidays

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI makes sure that the national regulations and agreements on working hours and regular paid holiday are adhered to.

## 7. Health and safety at work

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI does not compromise on a safe and healthy working environment for all employees and is committed to offering safe and healthy workplaces in accordance with national legislation. It seeks continuous improvement of its occupational health and safety performance.

## 8. Qualification

Gürfil A.S., subsidiary for GAP KABLO SAN. VE TIC. LTD.STI is committed to promoting measures aimed at the qualification of employees to the extent that broadening and consolidation of professional and technical knowledge is relevant for a particular job. In this context, vocational training and employment training are of particular importance and can be seen as a shared responsibility on one hand for the employer to provide the necessary training, and on the other hand for each employee to take up the offered training.

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