

CHILD LABOR PREVENTION PROCEDURE

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1. PURPOSE

The purpose of this procedure is to define the authorities, responsibilities, and methods to prevent all forms of child labour throughout all business processes and the supply chain of Mitaş Endüstri. The procedure aims to ensure full compliance with national legislation and international conventions, eliminate child labour, and establish effective mechanisms for monitoring, awareness-raising, and enforcement.

In addition, it seeks to support children's right to education, implement preventive measures to protect children at risk, and ensure full compliance with these principles by all business partners.

2. SCOPE

This procedure applies to all employees of Mitaş Industry under fixed-term or indefinite employment contracts, subcontracted staff, interns, and apprentices. It also covers all business partners, contractors, and subcontractors within Mitaş Endüstri's supply chain.

In all agreements with suppliers, the principle of zero tolerance towards child labour is adopted, and full compliance with these principles is mandatory for all business partners. The procedure covers not only directly employed personnel but also all individuals acting on behalf of Mitaş Endüstri throughout the supply chain and includes control and sanction mechanisms to prevent child labour at every stage.

3. REFERENCES

This procedure has been prepared in accordance with national and international legal regulations and standards. The following references provide the fundamental legal and ethical framework for the prevention of child labour:

- United Nations Universal Declaration of Human Rights
- International Labour Organization (ILO) Convention No. 138 and No. 182
 - o ILO Convention No. 138 – Minimum Age Convention
 - o ILO Convention No. 182 – Worst Forms of Child Labour Convention
- United Nations Convention on the Rights of the Child

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- Republic of Türkiye Ministry of Labour and Social Security – National Programme on the Elimination of Child Labour
- UNICEF Guide on Combating Child Labour
- ILO Guide on Combating Child Labour
- Labour Law No. 4857, Article 71 – Working Conditions for Children and Young Workers
- PR-003 Human Resources Procedure
- Visitor Instruction

4. METHOD

4.1. General

Mitaş Industry acts with the awareness that the use of child labour harms the physical, mental, emotional, and social development of children and prevents their fundamental right to education. In this context, Mitaş Industry undertakes full compliance with the “minimum age for employment” as defined by ILO standards, Labour Law No. 4857, and the social compliance rules of international brands, adopting the strictest requirement as the binding standard.

This commitment is not limited to Mitaş Industry’s own operations but also extends to all business partners, contractors, and subcontractors in its supply chain. A zero-tolerance policy against child labour is adopted and implemented in all business processes.

Within this framework:

- All business partners, contractors, and suppliers are obliged to declare in their signed contracts that they will comply with rules preventing child labour.
- Risk analyses on child labour are conducted regularly, effective monitoring mechanisms are established against suspicious cases, and sanctions are imposed where necessary.

Mitaş Industry is committed not only to fulfilling its legal obligations but also to upholding its ethical responsibilities by adopting and supporting sustainable and responsible business practices.

4.2. Organization

The responsibilities of the persons and units accountable for the implementation of this procedure are defined as follows:

4.2.1. Responsibilities

- **General Manager and Deputy General Managers:** Establish policies to combat child labour, ensure that these policies are communicated to all employees, subcontractors, and suppliers, monitor audit processes, enforce sanctions in case of violations, and coordinate preventive measures. Take the necessary actions in cases of nonconformity.
- **Human Resources Manager:** Closely monitor the procedures to ensure the prevention of child labour, verify compliance with age criteria during recruitment processes, and organize internal awareness trainings. In addition, evaluate reports or notifications from employees or external stakeholders and initiate investigations when required.

- **Production Managers:** Immediately direct job applicants or individuals who have entered the premises without a visitor card to the Human Resources Department or Security. Regularly audit suppliers and subcontractors to ensure that child labour is not used and report any nonconformities.
- **Security Officers:** Record the entry and exit of applicants and visitors, conduct identity checks to prevent the entry of underage individuals, and report suspicious cases to the Administrative Affairs or Human Resources Department.
- **Procurement Managers:** Verify that supplier companies comply with child labour policies, integrate control mechanisms related to child labour prevention into supplier audit processes, and suspend or terminate business relations in case of violations.

4.3. Implementation

All visitors arriving at the workplace are received by the security officer in accordance with the Visitor Instruction. The security officer requires every person wishing to enter the premises to present a photo identification. Entry is strictly prohibited without valid ID or with invalid/photocopied identification.

After identity verification and age determination, the following practices apply:

a) Official Visitors:

If the visitor arrives on duty, the supervisor of the department to be visited is informed. Following age verification, a visitor card is issued and handed over to the responsible person. Individuals under the age of 18 are strictly prohibited from entering the premises.

b) Personal Visitors:

The person the visitor wishes to meet is identified. Depending on the position of the employee, the supervisor or the individual concerned is informed directly. With their approval, the meeting is conducted either in a designated area under security supervision or outside the factory premises. If entry into the facility is necessary, a visitor card is issued, and the details are recorded in the visitor logbook. The age of the visitor is verified; visitors under the age of 18 are strictly prohibited from entering production areas and are only permitted to access office zones.

c) Job Applicants:

Applicants arriving for recruitment purposes are directed by the security unit to access the digital application form via QR code. Applications submitted through the system by candidates under the age of 18 are automatically rejected. Candidates aged 18 and above are evaluated by the Human Resources Department for suitability to the position and invited for interviews accordingly.

Applicants attending interviews are welcomed by an HR Specialist or Assistant. If unavailable, the authorized person defined in the organizational chart is informed of the process.

Candidates positively evaluated in the interview are required to complete all documents listed in the “Required Documents for Recruitment.” Once the documents are delivered to the Human Resources Department, the candidate is issued a “Work Card,” which must be visibly worn within the facility.

In the final stage of the recruitment process, candidates undergo orientation training covering Information Security, Occupational Health and Safety (OHS), and company rules.

4.4. Control, Feedback, and Improvement

For any nonconformities identified or recurring within this management system, action plans and corrective measures are prepared; the relevant processes are detailed, and sections of the management system are revised when necessary. Audit processes are continuously improved, risks related to child labour—including those within the supply chain—are analyzed, and the necessary preventive measures are implemented.

Internal audit and grievance mechanisms are strengthened; the responsibilities of employees and suppliers in combating child labour are reviewed. In this context, awareness-raising practices are introduced.

The effectiveness of this procedure is periodically evaluated during management review meetings and updated in line with the principle of continuous improvement.

5. ANNEXES

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