

COMPLIANCE

POLICY ON  
**PREVENTION OF  
DISCRIMINATION  
AND HARASSMENT**



# ***POLICY ON PREVENTION OF DISCRIMINATION AND HARASSMENT***

## **1. PURPOSE AND SCOPE**

The purpose and scope of the Policy on Prevention of Discrimination and Harassment (“Policy”) is to define the rules to be observed by Egebant in order to ensure a workplace free from all forms of Discrimination and Harassment, including Sexual Harassment. All employees, managers, and officers of Egebant shall comply with this Policy, which constitutes an integral part of the Code of Business Ethics. Egebant also expects all Business Partners to comply with and/or act in accordance with this Policy and takes the necessary measures to ensure such compliance.

## **2. DEFINITIONS**

**“Discrimination”** means unfair treatment or arbitrary distinction against a person based on race, gender (including pregnancy), color, nationality or social status, ethnic origin, religion, age, disability, sexual orientation, gender identity, marital or family status, sensitive medical conditions, trade union membership or activities, political opinion, or any other status prohibited by law.

**“Sexual Harassment”** means any unwelcome sexual advance, request for sexual favors, verbal or physical conduct of a sexual nature, or any other conduct of a sexual nature that may reasonably be expected to offend or humiliate another person or be perceived as such.

**“Human Rights”** refer to the inherent rights of all human beings, without distinction of gender, race, color, religion, language, age, nationality, opinion, national or social origin, or property status, including the right to live equally, freely, and with dignity, among other human rights

**“Universal Declaration of Human Rights”** is a milestone document in the history of human rights. Drafted by representatives from different legal and cultural backgrounds from all regions of the world, the Declaration was proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievement for all peoples and all nations, and it sets out, for the first time, fundamental human rights to be universally protected.

<https://www.un.org/en/universal-declaration-human-rights/>

**“Business Partners”** include suppliers, distributors, all types of representatives acting on behalf of the Company, subcontractors, and consultants.

**“Workplace”** refers to any location where Egebant employees perform their work. This includes physical locations such as offices and factories, as well as virtual workplaces that are not tied to a physical address.

**“Harassment”** refers to any inappropriate and unwelcome conduct that may offend, humiliate, or be perceived as humiliating another person.

### 3. GENERAL PRINCIPLES

Operating on a global scale, Egebant takes the Universal Declaration of Human Rights as guidance and adopts an approach that respects human rights toward all stakeholders. Creating and maintaining a positive and professional working environment for its employees is a fundamental principle of Egebant. All forms of Discrimination and Harassment, including Sexual Harassment, are strictly prohibited in the workplace.

One of Egebant's objectives is to provide a working environment consistent with human dignity, free from discrimination and injustice, and bringing together individuals from diverse backgrounds, cultures, professional experiences, and perspectives who aim to develop new ideas and solutions. Accordingly, hiring decisions are based on business needs, job requirements, and personal qualifications, without regard to race, gender (including pregnancy), color, nationality or social status, ethnic origin, religion, age, disability, sexual orientation, gender identity, marital or family status, sensitive medical conditions, trade union membership or activities, political opinion, or any other status prohibited by law.

### 4. COMMITMENTS

Egebant commits to providing and maintaining a working environment free from discrimination and harassment, including sexual harassment, where everyone is treated with respect and dignity, can contribute fully, and has equal opportunities.

The core element of Egebant's commitment to equal opportunity is zero tolerance toward any discrimination or harassment based on race, gender (including pregnancy), color, nationality or social status, ethnic origin, religion, age, disability, sexual orientation, gender identity, marital or family status, sensitive medical conditions, trade union membership or activities, political opinion, or any other status prohibited by law. Any such harassment directed at employees, managers, or officers of Egebant or its Business Partners is unlawful and will not be tolerated under any circumstances.

#### Prevention of Discrimination

Egebant strives to treat employees equally by providing equal pay for equal work, and equal rights and opportunities. No form of discrimination or disrespect based on the protected characteristics listed above is permitted.

Zero tolerance toward discrimination applies to all stages of employment, including recruitment, promotion, assignment, compensation, transfers, disciplinary actions, demotion, termination of employment, and access to benefits and training. Egebant expects its employees to treat one another in accordance with this zero-tolerance approach and to act with this awareness.

Corrective measures will be applied to any employee found to have engaged in discrimination, and continued violations may result in termination of employment in accordance with legal provisions. If any Business Partner is found to have engaged in unlawful discrimination, contractual relationships may be terminated.

#### Prohibition of Violence and Harassment, Including Sexual Harassment

An important way to protect employees' personal dignity is to take necessary measures to prevent any form of harassment or violence, and to apply appropriate sanctions should such incidents occur. Egebant commits to providing a working environment free from violence, discrimination, and harassment arising from or based on protected characteristics.

Accordingly, Egebant has zero tolerance for any form of physical, verbal, sexual, or psychological harassment; violence; bullying; abuse; or threats.

Harassment may take the form of words, behaviors, or actions that offend, frighten, exploit, humiliate, threaten, degrade, embarrass, or create an intimidating, aggressive, or hostile work environment. Harassment often involves a pattern of behavior but may also occur as a single incident. It may include, but is not limited to, inappropriate comments of a sexual, gender-related, ethnic, religious, racial, or age-based nature; jokes; nicknames; offensive or degrading remarks; emails; voice messages; or written or visual materials that mock or insult a person or group based on protected characteristics

Differences of opinion regarding work performance or job-related matters are not normally considered harassment.

In addition to the above forms of harassment, Egebant enforces a zero-tolerance policy toward sexual harassment in the workplace.

Sexual harassment may occur as part of a pattern of behavior or as a single incident, and may occur between individuals of the same or different genders. Both men and women may be victims or perpetrators of sexual harassment.

Any employee found to have violated these rules will be subject to corrective actions, including termination of employment. If a Business Partner violates this Policy, contractual agreements may be terminated.

## 5. AUTHORITY AND RESPONSIBILITIES

All employees and managers of Egebant are responsible for complying with this Policy and for implementing and supporting relevant procedures and controls in line with its requirements. Egebant also expects all Business Partners to comply with and/or act in accordance with this Policy and takes the necessary measures to ensure such compliance. This Policy has been prepared in accordance with Egebant's Human Rights Policy. In case of any conflict between this Policy and the applicable local legislation in the countries where Egebant operates, the more restrictive provision shall apply, provided that it does not conflict with local law.

If you become aware of any act that you believe violates this Policy, applicable legislation, or Egebant's Code of Business Ethics, you must report it through the Company's ethics channels listed below:

- Ethics WhatsApp Line
- Via the ethics form at: <https://www.egebant.com.tr/tr/kurumsal/etik-form>

All alleged violations of this Policy will be promptly and thoroughly investigated in accordance with the procedures defined in the Code of Business Ethics Policy. Retaliation, harassment, or any form of victimization against individuals who raise concerns will not be tolerated, and the identity of reporting individuals will not be disclosed unless otherwise consented, as defined in the Whistleblowing Policy.

Violations of this Policy may result in serious disciplinary action, including termination of employment. Contracts with third parties may be terminated if they violate this Policy.

Egebant is responsible for establishing, periodically reviewing, and revising this Policy when necessary, as well as for providing training to employees on the Code of Business Ethics and related policies, including the prevention of discrimination, harassment, sexual harassment, and human rights violations in the workplace. The Human Resources Department is responsible for the implementation of this Policy. Egebant employees may consult the Human Resources Department regarding any questions related to the application of this Policy.