



KONTROLMATİK TEKNOLOJİ, ENERJİ VE MÜHENDİSLİK A.Ş.

PREVENTING HARASSMENT & DISCRIMINATION POLICY	DOCUMENT NO	: KM.2025.007
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KONTROLMATİK TECHNOLOGY, ENERGY AND INGENEERING INC. (the “**Company**” or “**We**”) and its Subsidiaries, Affiliates, Dealers, Suppliers, Agents, Contractors, Representatives, Authorized Agents, and all third parties with whom it does business (the “**Company**” or “**We**”) as well as all employees working at these entities. They are obligated to comply with the Company's **Preventing Harassment & Discrimination Policy**.

The Company expect all staff to maintain high standards in accordance with Corporate Governance Policies and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all staff to raise any concerns that they might have about malpractice within the workplace. The aim of this procedure is to ensure that our workers are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

The following guidance sets out the procedure by which staff can report concerns about workplace practices. The Ethics Committee has been consulted and has agreed the contents of this procedure.

1. BASIC PRINCIPLES

- 1.1. The Company is committed to respecting human rights, human dignity, physical and psychological integrity, dignity, privacy, self-respect, and the right not to be subjected to degrading treatment. All Company employees are expected to act in accordance with laws and regulations.
- 1.2 Through this Protocol, the Company declares that no action or behavior, regardless of the victim or perpetrator, that constitutes workplace harassment will be tolerated.
- 1.3 Since many harassing behaviors occur in the digital realm or through the unauthorized processing of personal data in the current business and technological environment, the Company is committed to cooperating effectively, rigorously, and pro-actively to prevent, detect, correct, and punish any behavior that constitutes harassment, cyberbullying, or online harassment through social media.
- 1.4 To fulfill this commitment, all Company employees: In particular, team managers must contribute to the elimination of such behaviors through prevention, condemnation, and zero tolerance by assuming the following responsibilities:



(a) Respecting the dignity and fundamental rights of all individuals with whom they have work-related relationships (*colleagues, team members, suppliers, customers, external partners, etc.*).

(b) Avoiding behaviors, attitudes, and actions that are or may be offensive, degrading, humiliating, harassing, or hostile.

(c) Acting appropriately in the face of such behaviors, attitudes, and actions, not ignoring or tolerating them, expressing concern, preventing their recurrence or aggravation, reporting them to the relevant authorities, and supporting victims.

1.5 The Company's Employee Representatives and relevant responsible parties are committed to preventing workplace harassment by raising employees' awareness of this issue and informing Management of practices that can raise awareness on this issue. Furthermore, in addition to this commitment, they support their employees in combating sexual harassment, assault, and discrimination in the workplace through mandatory digital training and communication solutions. This procedure is for guidance only and does not form part of your contract of employment.

2. PURPOSE AND TARGET AUDIENCE OF THIS POLICY

2.1 This Policy aims to create an environment free from harassment, assault, or discrimination based on an individual's gender, sexual orientation, gender identity, or any other reason, and to establish the procedures and principles for this environment. The Company is committed to providing a healthy work environment for all employees.

2.2 Exposure to unwanted sexual behavior and violence can have negative and traumatic effects on an employee's personal and professional lives, as well as on their emotional and physical health. Harassment and assault are not only a human rights violation but also a criminal offense. With this policy, Company employees understand and agree that the Company will not tolerate harassment under any circumstances:

(a) To help create a safe environment within the Company based on mutual respect and trust, free from sexual harassment and assault;

(b) To inform Company employees about harassment and to prevent and eliminate all forms of harassment, assault, and violence;

(c) To strive to eliminate sexist cultures;

(d) To raise awareness about mainstreaming gender equality and preventing all forms of discrimination and violations based on gender, sexual orientation, and gender identity;

(e) To establish an effective mechanism to address complaints of sexual harassment or assault;

(f) To support the complainant when a complaint of harassment or assault is received;



(g) To encourage the complainant to report any incidents they have experienced, are experiencing, or witnessed in order to protect them and to stop unwanted sexual behavior.

2.3 This Policy is a reference guide for those who wish to obtain information about harassment and assault, believe they have been harassed, or witnessed such an incident. The Company declares and undertakes that harassment and assault will not be tolerated or condoned under any circumstances, and that it encourages employees who believe they have been harassed or assaulted or witnessed such an incident to take the necessary precautions. Reports and complaints are made on a voluntary basis. The Company is committed to keeping all complaints confidential and protecting the privacy of its employees.

3. LEGAL FRAMEWORK: “NATIONAL & INTERNATIONAL”

This Policy has been prepared based on the United Nations Global Compact (UNGI), the Council of Europe -Istanbul Convention on Preventing and Combating Violence against Women and Domestic Violence, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), as well as the Constitution of the Republic of Türkiye, the Turkish Penal Code, the Turkish Employment Law, the Occupational Health and Safety Law, the Turkish Code of Obligations, and the Company’s Ethics and Integrity Principles. Violation of this Policy may result in the justified termination of the employment contract/relationship, legal prosecution, and disciplinary action, in accordance with applicable Employment Law and other legal obligations.

3.1 Definition of Harassment in the Workplace

Harassment refers to any visual, verbal, or physical conduct, whether by force or not, that humiliates or offends an individual(s) because of their race, ethnic origin, sexual orientation, gender, or personal characteristics. Examples of behaviors that would be considered workplace harassment if they occur systematically include:

- Excluding or ignoring an individual
- Withholding effective work or information from an employee without justifiable cause
- Assigning or assigning impossible tasks or assigning people to worthless or pointless tasks
- Retaliating against employees who file complaints, reports, or allegations against the organization or those who support them
- Constantly belittling or humiliating an employee
- Making derogatory criticisms about work performed in front of others
- Sharing or spreading comments and jokes through instant messaging applications or social media that degrade or degrade an employee's professional value
- Using or spreading images, photos, or videos through any means, including digital channels (especially social networks, apps, and instant messaging services), to undermine a person's dignity and create a degrading or hostile environment
- Making insulting remarks or false rumors about a person's work or private life, either verbally or through instant messaging applications or Social Media Dissemination
- Recording degrading images that violate employee privacy
- Unauthorized use of any personal data to create a hostile work environment for employees.



3.2 Definition of Harassment Based on Sexual Orientation or Gender Identity

Harassment based on sexual orientation or gender identity is any behavior that has the purpose or effect of violating a person's dignity by creating an intimidating, degrading, humiliating, or offensive environment based on a person's sex, sexual orientation, or gender identity. The following are examples of behaviors that constitute harassment based on sexual orientation or gender identity:

- ◆ Making sexually explicit remarks, jokes, or compliments, or using suggestive language
- ◆ Engaging in unusually persistent behavior for the purpose of flirting
- ◆ Showing or sending pornographic materials
- ◆ Forcing someone into sexual contact or intercourse by threatening to use or disseminate audio and/or video recordings without consent
- ◆ Recording, sharing, or disseminating sexually explicit or nude images of someone without their consent
- ◆ Asking questions or spreading rumors about someone's sexual life
- ◆ Engaging in sexually explicit behavior through threats, blackmail, or insults
- ◆ Stalking
- ◆ Making offensive gestures, staring, or staring
- ◆ Sending sexually explicit messages or making sexually explicit requests or insinuations via phone, e-mail, or social media
- ◆ Insistently proposing sexual intercourse.

4. PERSONNEL RESPONSIBLE FOR IMPLEMENTING THE PROCEDURE

- 4.1 The Board of Directors has overall responsibility for the Company's **Sexual Harassment & Discrimination Policy**, but has delegated day-to-day responsibility for overseeing and implementing this Policy to the **Designated Reporting Officer ("DWO")**, currently the **General Secretary/General Counsel**. Responsibility for monitoring and reviewing the operation of this Policy and for recommending internal changes resulting from investigations into complaints under the Policy rests with the Ethics Committee.
- 4.2 The Managers have a special responsibility to facilitate the operation of this Policy and ensure that employees can raise concerns without fear of reprisal in accordance with the procedure outlined below.
- 4.3 All employers are responsible for the success of this Policy and must take the necessary steps to disclose any wrongdoing or misconduct of which they become aware. If you have any questions about the content or implementation of this Policy, you should contact the DWO.
- 4.4 As stated in the Company's Ethics & Integrity Principles, Company employees must act honestly and transparently in compliance with applicable laws and regulations, act with common sense and professionalism consistent with the social impact of the financial sector and be worthy of the trust placed in them by the Company's shareholders and customers.



4.5 Company employees who believe they have been subjected to or witnessed sexual harassment or discrimination can report the incident by following the steps below:

- Discussing the matter with your immediate supervisor, HR or DWO.
- If for any reason you find this method inappropriate or are unsure whether it is the most appropriate way to resolve the issue, you can report the incident through the Report/Notification website: <https://kontrolmatik.etikmerkezi.com> or by calling the Ethics Report Line during business hours (09:30-17:30) at **0850 406 3195**.
- The Compliance Department carefully evaluates all reports it receives as quickly as possible, in accordance with the Ethics Report Line Management and Reporter Protection Policy, and ensures that the reports are reviewed and resolved. Reports are analyzed objectively, impartially, and confidentially. The identity of the reporting employee is kept confidential. This information is shared only with the units required to be involved in the investigation process.
- Throughout the process, due care and attention is paid to avoid any behavior that could lead to the applicant's re-victimization and undermine the parties' sense of human dignity and trust, and to prevent such behavior from occurring.
- During the support process, questioning and accusatory words, behaviors, attitudes, and insinuations that could exacerbate victimization are avoided. Employees who are subjected to harassment and discrimination can receive support from Employee HR.
- The matter can be referred to the Disciplinary Board for the necessary assessment and administrative sanctions against those responsible for any mistreatment, discrimination, or harassment, or for concealing such behavior. The Disciplinary Board may decide to impose administrative sanctions based on the nature and severity of the offending act, and the direct or indirect role of the employee who caused the act. Following the investigation, the necessary precautions are taken and the decision to impose administrative sanctions (*written warning, reprimand, termination, etc.*).

5. CORRECTIVE ACTION AND COMPLIANCE

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigative team to enable the Company to minimize the risk of the recurrence of any malpractice or impropriety which has been uncovered. The Ethics Committee will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required to the Board of Directors.

6. MONITORING AND REVIEW OF POLICY

6.1 Personnel are invited to comment on this policy and suggest ways in which it might be improved by contacting the DWO.

6.2 This Policy reflects the Company's practice as of **December 2, 2025**. The DWO, in conjunction with the Ethics Committee, is responsible for reviewing this policy at least once a year.