



ZERO TOLERANCE POLICY TOWARDS ALL FORMS OF VIOLENCE HARASSMENT AND DISCRIMINATION

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1. Purpose

At Enerjisa Enerji A.Ş. (Company, Enerjisa), we recognize the importance of protecting and promoting fundamental human rights across our operations, extending such commitment to all third parties who operate with us. In accordance with International Labour Organization Convention No. 190, we understand that violence, harassment, and discrimination in the workplace constitute a human rights violation or abuse and a threat to equal opportunities; we, therefore, uphold a zero-tolerance policy towards violence in the workplace.

Enerjisa is committed to providing a respectful, equitable, inclusive, and safe working environment for its employees and stakeholders through its zero-tolerance policy towards all forms of violence and GBVH (Policy). The policy aims to set the principles and inform respective processes and procedures to drive a coherent and integrated approach to promoting a work environment free from all types of violence, harassment, and discrimination.

Enerjisa recognizes the adverse impact of violence and harassment on people and does not tolerate any violence and harassment, whether direct or indirect, including gender-based violence and harassment (GBVH).

This Policy is adopted and owned by the Board of Directors of Enerjisa. Compliance (Compliance & Group Legal Directorate), Sustainability (Head of Sustainability & Corporate Capabilities), and People & Culture (Head of People & Culture) departments (Responsible Departments) are responsible for reviewing and amending this Policy as necessary.

All Enerjisa managers and employees are responsible for maintaining a workplace free from threats, acts of violence, and harassment. Enerjisa will work to provide a safe workplace for employees, suppliers, contractors, business partners, and all others with whom it has a business relationship, including customers and every actor within its value chain. Each employee and everyone with whom we come into contact in our work deserves to be treated with dignity and respect.

2. Scope

2.1. People

This Policy applies to all Enerjisa employees and the employees of its subsidiaries, regardless of their positions and/or their contractual status, including management, employees, and temporary workers and contractors. Enerjisa also expects all its suppliers, contractors, business partners, and all others with whom it has a business relationship, including customers and every actor within its value chain, to conform to the principles in this Policy. For the sake of clarity, this Policy also covers the relationship between Enerjisa employees and customers.

2.2. Workplace

The Policy covers all places where employees need to be or to go because of their work and which are under the direct or indirect control of the employer, including but not limited to the following:

- public and private spaces where they are a place of work;
- digital workplaces and remote working environments,
- in places where the employee is paid, takes a rest, a break or a meal, or uses sanitary, washing, and changing facilities;
- during work-related trips, travel, training, events, or social activities;
- through work-related communications, including those enabled by information and communication technologies;
- in employer-provided accommodation or
- when commuting to and from work.

2.3. Enerjisa Policies

This Policy is an integral part of:

- Company's Code of Conduct ("ENETİK"),
- Principles we have been committed to conform with by participating in the United Nations Global Compact,
- Principles we have been committed to conform with by signing UN Women's Empowerment Principles (WEPs)
- Human Rights Policy,
- Anti-Retaliation Policy,
- Human resources procedures and practices,
- Diversity, Equity and Inclusion policy and procedures
- Procedure on the Board of Workplace Conduct Evaluation,
- Procedure on Ethics Committee and Internal Audit/Ethical Investigation,

Local law may establish a different mandatory standard or requirement related to workplace violence, harassment, and discrimination, and that standard or requirement will apply.

2.4. Behaviors

This Policy governs the principles concerning any types and forms of violence, including GBVH, in the workplace and domestic violence. Enerjisa recognizes the intersectional nature of violence and harassment by recognizing that individuals may face multiple forms of discrimination based on factors such as race, ethnicity, sexual orientation, disability, socioeconomic status, or any other legally protected factors. Any actions, behaviors, or communications contributing to a hostile work environment and/or that may result in another person feeling threatened or unsafe are strictly prohibited. The described behaviors are deemed unacceptable and subject to disciplinary and other procedures as defined hereunder, and they may also lead to criminal, civil, and administrative proceedings under the applicable laws.

3. Policy Principles

Through this policy document, Enerjisa:

- **Violence-Free Workplace and Safe and Respectful Working Environment:** Ensures a working environment that respects human rights and is equitable, inclusive, and safe. Commits to maintaining a workplace that distances itself from all forms of violence and demonstrates zero tolerance for violence and harassment. Creates a secure working environment where employees affected by domestic or workplace violence can seek help.
- **Non-Discrimination:** Adopts the principle of nondiscrimination based on race, gender (including pregnancy), color, nationality, social status, ethnic origin, language, religion, age, disability, sexual orientation, gender identity, family and marital status, sensitive medical conditions, union membership or activities, political opinion, or any legally protected factor.
- **Gender Equality:** Embraces and promotes a zero-tolerance stance against all forms of violence and harassment, including domestic violence, with a sensitivity to gender equality.
- **Leadership Commitment:** Enerjisa's leadership is dedicated to upholding this zero-tolerance policy by promoting a safe, respectful, and inclusive work environment. Leaders will allocate necessary resources, participate in training, ensure transparent accountability, and support affected individuals.
- **Training and Awareness:** Through training activities, increase awareness and educate employees and managers at all levels on the subject.
- **Recruitment and Employment:** Fights against all forms of discrimination, violence, and harassment at all stages of job application, recruitment, employment, and termination.
- **Confidentiality and Privacy:** Protects the confidentiality and privacy of those subjected to violence.
- **Support Mechanisms:** Establishes accessible mechanisms for those exposed to violence, including workplace and domestic violence, to seek help.
- **Social Dialogue:** Develops and implements necessary measures through an effective framework based on stakeholder social dialogue.
- **Occupational Health and Safety:** Recognizes violence and harassment as an occupational health and safety issue, conducts risk assessments, including

domestic violence, and creates prevention plans with the participation of employees

- **Domestic Violence:** Provides mechanisms for employees affected by domestic violence to seek support and offers assistance in their empowerment processes according to procedures.
- **Effective Complaint Mechanisms:** Establishes effective, impartial, and reliable complaint, investigation, guidance, support, and remediation mechanisms that protect the confidentiality and privacy of those involved and protects employees from retaliation.
- **Non-Violent Language Usage:** Promotes the use of equitable, inclusive, and non-violent language in the workplace and raises employee awareness through training.
- **Performance Support:** Provides necessary support to employees affected by violence to prevent performance anxiety at work.
- **External Support Organizations:** Shares contact information for external support organizations dealing with violence and harassment and ensures necessary referrals are made with due respect for confidentiality and privacy.
- **Supply Chain:** Promotes awareness and a zero-tolerance stance against violence within the supply chain and encourages related efforts.
- **Right to Information:** Ensures employees effectively use their right to information and consultation on matters related to violence and harassment.
- **Identifying Issues and Needs:** Conducts regular surveys and similar studies to identify employees' problems and needs to prevent discrimination, violence, and harassment in the workplace and reflects the results in relevant policies and procedures.
- **Corporate Culture:** Integrates the policy provisions into corporate culture as part of understanding dignified work, adopting a holistic approach in the fight against violence and harassment.
- **Collaborations:** Engages in comprehensive, inclusive, and constructive collaborations with public institutions, non-governmental organizations, and/or labor and employer organizations for a working life free from violence and harassment.

- **Policy Dissemination:** Ensures the policy is widely communicated and explained to all relevant parties. Supports the policy with regularly updated procedures.
- **Information and Training:** Develops necessary strategies and creates appropriate conditions to inform and educate all employees about the content of the Zero Tolerans Policy Towards All Froms of Violence, Harassment and Discrimination
- **Periodic Review:** This policy will be reviewed annually to ensure alignment with legal standards and best practices, incorporating feedback from employees and stakeholders. Updates will be made as necessary, with findings reported to senior leadership to inform strategic actions.