

ZERO TOLERANCE POLICY TOWARDS VIOLENCE

Publication Date: 22.04.2022

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1.Purpose

Enerjisa Enerji A.Ş. ("Company, Enerjisa") cares about health and safety of its employees. The purpose of Zero Tolerance Policy Towards Violence ("Policy") is to set the principles and enforcement process to create a work environment at the Company that is equalitarian, safe and not tolerant against any kind of violence. In line with this purpose, the Company makes an endeavor to increase awareness about violence, to create support and assistance mechanisms in which employees subjected to violence can share their situation in a secure and confidential manner and to operate an enforcement mechanism through effective examination and auditing processes.

2.Scope

This policy covers all partnerships, all employees and senior management of Enerjisa. Enerjisa also expects all its suppliers and business partners to act in conformance to the principles determined as part of this policy.

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,
- Human Rights Policy,
- Policy of Preventing Retaliation,
- Human resources practices

3.Definitions

Physical violence: Using physically aggressive behaviours trying to dominate the victim by the perpetrator of violence. Examples of physical violence include pushing, hitting, raising hand to hit, injuring with or without a weapon, throwing an item.

Psychological violence: Using emotional or psychological power systematically. Examples of psychological violence include exhibiting humiliating and threatening behavior, making a person feel incompetent and weak, making fun of them, swearing and insulting.

Sexual violence: Defined as forcing one to have sexual intercourse in a place, manner or time they do not agree or using sexually language or implying the same, making sexually explicit jokes, harassing.

Economic violence: Using systematic pressure on a person about their economic decisions and acting in a way that inhibits economic freedom of a person. Examples of economic violence include preventing a person from working, seizing or taking control of a person's income and savings.

Digital violence: Defined as utilisation of technological means to bring a person under control, humiliate, belittle, harass and punish a person. Examples of digital violence include continuously sending messages or calling a person to the point of disturbing; examining social media accounts and stalking them using the information on such accounts, threatening them, humiliating them on social media, and sharing content with insults and hateful speech.

Stalking: Defined as attitudes and behaviours that are deliberately repeated to prevent a person from feeling safe, creating constant fear and anxiety about being subjected to violence. Examples of stalking include following a person after work and keeping track of their whereabouts.

4.Enerjisa is Against All Kinds of Violence

Our company acknowledges that violence and harassment a person faces in both professional and domestic environments is a violation of human rights and a threat to equal opportunity and that women are disproportionately affected by gender-related violence and harassment. In order to create a healthy and safe work environment far away from any kind of violence and threat in this context, our Company is against all kinds of violence, abuse and behaviours that harm the state and feeling of being safe at the workplace.

In line with the approach of creating a sustainable, fair working environment respecting human rights at the workplace, Energisa undertakes

- To encourage a working culture based on mutual respect and human dignity and to create a healthy working environment for employees without violence,
- To raise awareness among employees by providing trainings about preventing all kinds of violence and harassment and protection methods and to raise the awareness of employees,
- To provide the necessary assistance to inform and guide employees for their reports regarding violence and harassment, to provide support for a resolution and to create the necessary mechanisms to ensure protection of confidentiality and privacy,
- To effectively conduct grievance, investigation and disciplinary processes by attending to confidentiality and impartiality in case a violence and harassment situation arises at the workplace,
- To develop constructive collaborations with public institutions, nongovernmental organisations and relevant organisations in line with a genderconscious approach in order to end all kinds of violence and harassment.

5.Violence at Workplace

Our employees also have a right to apply to our support channel operated with a commitment to privacy, confidentiality and impartiality in case they are subjected to violence and harassment behaviours that damages the safe environment in the workplace and harms physical and psychological safety. In such an event, channels that employees can apply are listed below:

- Manager of the applicant and/or People, Culture and Labour Relations Management
- Support Line on Violence (+90 0212 924 78 55) (In cases of Gender-based Violence and Harassment)

Applicants can also apply, if they wish, without specifying their personal information (anonymously).

Whether the applications considered for an investigation is assessed by Human, Culture and Labour Relations Management with the opinion of Compliance and Legal Consultancy. If Internal Auditing Department decides to conduct examination and investigation as a result of the above-mentioned assessment, in the necessary cases disciplinary actions are enforced according to the relevant regulation and internal procedures following examination and investigation. The results of the investigation are discussed with the applicant and necessary information is conveyed to them.

6.Domestic Violence

a) A Company Employee Being a Victim of Domestic Violence

Enerjisa considers a responsibility to create the necessary processes and support channels to protect and support employees who shared that they are subjected to domestic violence. In addition to the supports that may be provided by governmental or non-governmental organisations, Enerjisa, as an employer, commits to take the necessary actions in order to facilitate work life of the employee who is a violence victim and to increase their security at the workplace.

A support channel based completely on consent and confidentiality has also been created in our Company where employees subjected to domestic violence can share their situation without hesitation and ask for support in order to enable them to get out of the cycle of violence and to encourage them to take action about the situation. In such an event, channels that employees can apply to are listed below:

- Manager of the applicant and/or People, Culture and Labour Relations Management
- Support Line on Violence (+90 0212 924 78 55) (In cases of Gender-based Violence and Harassment)

Applicants can also apply, if they wish, without specifying their personal information (anonymously).

In case of an employee who has been a victim of domestic violence demands such actions to be taken possible support actions to take are listed below:

- If the victim has a protection or restraining order given by the court, below listed supports are provided for the employee as part of workplace security planning for enforcement of this order in the workplace as well:
 - Where possible, service routes that the employee uses for commute may be rearranged.
 - Security officers may escort the employee to the service buses provided by the workplace or to the public transportation vehicles.
 - Where possible, special parking services may e provided for the employee and security officers may escort the employee to their vehicle.
 - Employee's contract details such as working location, business phone number, e-mail address may be changed.
- The information of the employee's account where the salary and benefits of the employee are paid may be changed in order to prevent the perpetrator to seize these.
- Paid administrative leave may be given to the employee without effecting their rights to leave. The duration of leave is decided on together with the employee.
- In case of the employee's demand, Support Line on Violence may provide the psychological support needed.

b) A Company Employee Being a Perpetrator of Domestic Violence/ Threatening to Perpetrate Domestic Violence

In case employees are determined to perpetrate domestic violence or to make threats to perpetrate domestic violence by using company's resources (telephone, email, mail, fax, automobile, office supplies, photocopiers, uniforms, etc.), the necessary examinations shall be conducted and disciplinary actions shall be taken according to the relevant regulation and internal procedures when required. Law enforcement forces shall be included in the process if deemed necessary.

c) Employee who Learns a Colleague is Subjected to Domestic Violence

Our Company's employees are responsible for encouraging their colleagues to contact the departments providing support about this subject in case they learn any of their colleagues is subjected to domestic violence. They cannot contact the relevant departments on behalf of the victim of domestic violence. Victim of domestic violence may request support from the relevant departments only if they desire to do so.

d) In Case Perpetrator and Victim of Violence are Working at the Same Company

In case perpetrator and victim of domestic violence are working at the same company, and the issue is reported, the support actions included in item 6.a. of this Policy shall be taken first; in addition, the necessary measures shall be taken to prevent the perpetrator to be close to the victim of violence.

7.Non-corporate Support Channels

Some of the non-corporate support channels that employees subjected to domestic violence may apply to for their situation are listed below:

Emergency Telephone Lines

- ALO 183- Family, Woman, Child and Disabled Social Service Hotline
- ALO 155 Polis Emergency Line
- ALO 156 Gendarme Emergency Line
- ALO 112 Emergency Ambulance Service
- Emergency Hotline for Domestic Violence 0212 656 96 96 / 0549 656 96 96
- ALO 170 Business Life Communication Centre

Other Supporting Organisations

- Provincial Directorates for Family and Social Policies
- ŞÖNİM (Centre for Prevention and Monitoring of Violence)
- Bar Associations
- Municipalities' Advisory Centres for Women

Mobile Applications

• KADES (Support for Women) Mobile Application

8. Raising Awareness and Training

Creating consciousness and raising awareness about the subject is a very important factor in preventing all kind of violence. The Company will develop training programs and provide for employees' access in order to increase attention about the subject among employees and to inform them about what to do in situations they may encounter.

This policy is an integral part of Enerjisa's sustainability approach and Enerjisa's Code of Conducts. This Policy has been approved and entered into force by Board of Directors' of Enerjisa Enerji A.Ş.. This Policy is published on the company's investor relations website in two languages, in Turkish and English.