



## PREVENTION OF DISCRIMINATION AND HARASSMENT POLICY

Document No	Issued On	Revised	Revision No
<b>PO-030</b>	<b>4/17/2025</b>	-	<b>0</b>

### 1. PURPOSE AND SCOPE

Mitaş Industry is committed to protecting employee rights in all human resources processes such as recruitment, training, promotion, remuneration, working conditions, and termination of employment, and to creating a fair, safe, and respectful work environment. This policy defines the fundamental principles and rules for preventing discrimination and harassment; and supports employee satisfaction, inclusiveness, and corporate sustainability.

This policy covers all employees, managers, interns, apprentices, job applicants, employees with fixed-term or indefinite contracts, subcontractor staff, contractors, external service providers, suppliers, customers, and all business partners with whom Mitaş Industry is in contact.

### 2. DEFINITIONS AND ABBREVIATIONS

**Discrimination:** Treating a person negatively, exclusively, or differently due to their race, gender, age, religion, language, ethnic origin, disability status, sexual orientation, marital status, or similar personal characteristics.

**Harassment:** Any verbal, written, or behavioral act that undermines a person's dignity, humiliates, threatens, or causes sexual or physical discomfort. It can occur in physical, psychological, verbal, or digital environments.

**Diversity:** Refers to an environment where individuals with different backgrounds, experiences, beliefs, skills, identities, and perspectives come together and contribute.

**Equal Opportunity:** Ensuring that employees have equal access, development, and advancement opportunities regardless of gender, age, disability, ethnic origin, beliefs, or other personal characteristics.

**Zero Tolerance Policy:** The approach that discrimination, harassment, maltreatment, and practices contrary to human rights will not be tolerated under any circumstances, and such actions will result in disciplinary procedures.

Prepared by Human Resources Assistant Specialist KUTAY KÖKNEL	Approved By Human Resource Manager ZEYNEP KOMİTOĞLU ALP
---	---

**Whistleblowing Mechanism:** The corporate communication system that allows employees to confidentially report discrimination, harassment, or unethical behavior they experience or witness.

**ESG:** Environmental, Social, and Governance criteria, which form the basis of the sustainability assessment approach.

**ILO:** International Labour Organization.

**UN:** United Nations.

**EU:** European Union.

### 3. REFERENCES

This policy has been prepared in consideration of national and international legal regulations and standards. The following references constitute the fundamental legal and ethical framework for the prevention of discrimination and harassment:

- Universal Declaration of Human Rights (United Nations)
- International Labour Organization (ILO) Conventions
  - ILO Convention No. 111: Discrimination (Employment and Occupation) Convention
  - ILO Convention No. 190: Violence and Harassment Convention
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- Charter of Fundamental Rights of the European Union
- Constitution of the Republic of Türkiye – Principle of Equality (Article 10)
- Labour Law No. 4857 – Principle of Equal Treatment (Article 5)
- Law on the Human Rights and Equality Institution of Türkiye

### 4. GENERAL PRINCIPLES

Mitaş Industry regards the creation of a working environment where all employees feel valued, safe, and entitled to equal rights as one of its fundamental priorities. As an institution, a zero-tolerance policy has been adopted against all forms of discrimination and harassment based on race, ethnic origin, gender, age, religion, disability status, sexual orientation, or other individual differences.

In this regard, the principles of equal pay for equal work, equal opportunities for career development, objective recruitment processes, and respect for individual differences are among the indispensable elements of the corporate culture.

Mitaş Industry, together with its managers, employees, and all business partners, recognizes the establishment of a respectful, inclusive working environment based on ethical values as an inseparable part of both corporate responsibility and individual obligation.

**Accordingly, all employees and business partners are explicitly expected to:**

- Develop sensitivity against all kinds of discrimination, harassment, exclusion, and maltreatment, and take effective action against such cases,
- Create equal opportunities, promote diversity, and show respect for individual differences,
- Embrace a business culture based on ethical values that is fair and inclusive,
- Fully comply with the provisions of this policy.

This approach is not only a requirement of respect for human rights but also one of the fundamental principles that support the **corporate integrity, reliability, and sustainable success** of Mitaş Industry.

## 5. METHOD

### 5.1. IMPLEMENTATION RESPONSIBILITIES

Mitaş Industry has structured its diversity and equal opportunity policy in line with international standards and best practices in the sector. Within this framework, recruitment and career development processes are carried out objectively, based solely on competence, experience, and position requirements; no employee is discriminated against on the basis of gender, age, ethnic origin, religion, disability status, or other individual differences. All employees are granted fair and equal access to promotion and development opportunities.

To foster an inclusive, safe, and respectful workplace culture at the corporate level, awareness programs are implemented, inclusive leadership training is provided to managers, and periodic information sessions and training activities are conducted for employees on the content of the policy. In this way, employees are not only made aware of the policy but are also encouraged to integrate it effectively into their daily work processes.

Mitaş Industry firmly enforces its zero-tolerance policy against discrimination and harassment to ensure that all employees work in a respectful, safe, and fair environment. Through this methodological approach, the continuity of a structure that supports diversity, upholds equal opportunity, and promotes an inclusive culture is guaranteed.

### 5.2. VIOLATION REPORTING AND ASSESSMENT

In cases of discrimination of any kind—particularly physical, verbal, psychological, or sexual harassment—employees have the right to file a report under the Ethics Violation Reporting Procedure. The identity of the reporting employee is protected under strict confidentiality principles, and this assurance is provided directly at the Board of Directors level.

The receipt, evaluation, and resolution of violation reports fall under the authority and responsibility of the Board of Directors; the administrative coordination of the process is carried out by the Human Resources and/or Legal Department. If a violation is identified, immediate corrective actions are taken, full compliance with ethical rules is enforced, and, if necessary, the relevant process is initiated in accordance with the company's Disciplinary Regulation.