

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

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1. OVERVIEW, PURPOSE AND SCOPE

We Martur Fompak International, conduct business in respect of human rights dignity and have zero-tolerance to harassment and discrimination of all kinds. With this Policy, we aim to promote a safe, respectful and ethical work environment in which our employees and all Business Partners are free from discrimination and harassment of all kinds. Therefore, we expect all our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners, such as customers, suppliers, contractors, and consultants, to comply with and act in line with this Policy and to always do business in accordance with our Global Code of Conduct. By this Policy, we actively prevent and prohibit such aforementioned or similar conduct.

2. DEFINITIONS

Discrimination refers to any unequal, intentional or unintentional treatment of individuals or groups based on certain characteristics such as race, color, sex and gender, religion, sexual orientation, age, ethnicity, national or social origin, pregnancy, parenthood and family responsibility, political opinion, trade union membership or activities, health status, disability, or other status prohibited by the law.

Harassment refers to a pattern of behavior or a course of comments or actions that is unwanted, unwelcome, embarrassing, humiliating or offensive, and is intended to disturb, upset, or intimidate someone. It can manifest in various forms, including verbal, physical, or electronic communication, and may involve threats, insults, intimidation, or unwanted advances. It involves behavior that creates a hostile or intimidating environment for the recipient.

Sexual Harassment is a form of harassment that involves unwelcome sexual advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature.

Moral Harassment is psychological harassment or emotional abuse that refers to behaviors that undermine an individual's dignity, integrity, or self-esteem.

Workplace is either physical spaces such as buildings, offices, plants, any places visited by the employee arising out of the course of employment including transportation provided by the company or virtual workplaces where employees work remotely using digital tools and technologies to communicate and collaborate.

3. GENERAL PRINCIPLES

Our guide is the United Nations Universal Declaration of Human Rights, by which it is aimed to reject all forms of discrimination and harassment including Sexual and Moral Harassment either during or in connection with its activities. We understand that discrimination and harassment constitute misconduct, which harms the safety of our work environment, the integrity and reputation of the company.

Our objective is to create and maintain a work environment where every individual is treated with respect and dignity that promotes equal opportunities regardless of any personal characteristics including race, color, sex and gender, religion, sexual orientation, age, ethnicity, national or social origin, pregnancy, parenthood and family responsibility, political opinion, trade union membership or activities, health status, disability or other status protected by law. Each individual has the right to operate in an institutional and professional atmosphere free of prejudice, harassment, discrimination and retaliation.

4. COMMITMENTS

We have zero-tolerance against any type of Discrimination and any type of harassment, whether sexual or moral. Employees from all genders and sexual orientations can be either the victims or the perpetrators. Such acts or incidents may occur on a one-time basis or repeatedly. Differences of opinion regarding work performance or other work-related matters are not generally classified as discrimination or harassment.

1. Non-discrimination

We embrace diversity and we are firmly committed to eliminating Discrimination.

Our objective remains clear: to cultivate an environment of mutual respect, equity, and dignity throughout the Workplace. Employment-related decisions including recruitment, training and development, career planning, compensation, and termination are made solely based on merit, qualifications, and performance.

2. Anti-Harassment

This applies to violence and harassment within the Workplace, whether it occurs during work, in connection with work, or because of work activities. It is against our Policy for any employee to physically or verbally harass another employee.

Harassment may happen in various types like insults, slurs, offensive jokes, derogatory comments about someone's appearance, race, gender, religion, sexual orientation, or abilities, age-based-remarks, humiliating epithets, unwanted touching, physical assault, impeding someone's movement, or intimidating gestures, intimidation, threats, bullying, spreading rumors, or isolating someone from their colleagues, sending threatening emails, spreading harmful rumors online, cyberstalking, or sharing someone's private information without consent, or similar inappropriate behaviour, gesture, or words.

5. AUTHORITY AND RESPONSIBILITIES

All our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners are expected to align with and actively support these principles by promoting a Workplace where everyone is valued and treated with dignity and respect.

In addition, all individuals who experience or witness any conduct they believe to conflict with this Policy, should report with assurance of confidentiality and protection from retaliation as outlined in our Whistleblowing Policy.

6. VIOLATIONS AND CONSEQUENCES

By this Policy, we actively prevent and prohibit such aforementioned or similar conduct. Our zero-tolerance principle means; if such a conduct does occur, we will look into and review every allegation of violation, take appropriate action in order to maintain well-being at work which is a prerequisite. If there is a discrepancy between the local regulations, applicable in the countries where our company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by Business Partners or any third parties, their contracts may be terminated. This Policy will be periodically reviewed by the Legal and Compliance Team to ensure compliance with new or revised laws and regulations.