



**GLOBAL
ANTI DISCRIMINATION AND
ANTI HARASSMENT POLICY**

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1. PURPOSE AND SCOPE

The purpose and scope of this Global Anti-Discrimination and Anti-Harassment Policy (**“the Policy”**) is to set out the rules to be considered by Company in order to maintain a workplace free of any form of Discrimination, and Harassment, including Sexual Harassment.

All employees, directors and officers of Company shall comply with this Policy, which is an integral part of Koç Group Code of Ethics²⁶ and Company Global Code of Conduct. Company also expects and take necessary steps to ensure that all its Business Partners comply with and/or act in line with this Policy.

2. DEFINITIONS

“Beko” or “Company” refers to all companies directly or indirectly, individually or jointly controlled by Arçelik A.Ş. and its joint ventures.

“Business Partners” includes suppliers, distributors, dealers, authorized services and other third parties with whom the company has a business relationship and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, as well as their employees and representatives.

“Discrimination” is any unfair treatment or arbitrary distinction based on a person’s race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities, political opinion or other status prohibited by law

“Harassment” is any inappropriate and unwanted behavior that could reasonably be anticipated or interpreted to offend or humiliate another person.

“Human Rights” are rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, difference of thought, national or social origin, and wealth. This includes the right to an equal, free and dignified life, among other Human Rights.


“Koç Group” means Koç Holding A.Ş., companies which are controlled directly or indirectly, jointly or individually by Koç Holding A.Ş. and the joint venture companies listed in its latest consolidated financial report.

“Sexual Harassment” is described as any unwanted sexual advance, request for sexual favor, verbal or physical sexual conduct or gesture, or any other sexual behavior that may reasonably be anticipated or interpreted to cause offence or humiliation to another.

“Universal Declaration of Human Rights (UDHR)”²⁷ is a milestone document in the history of Human Rights, drafted by representatives with different legal and cultural backgrounds from all regions of the world, proclaimed by the United Nations General Assembly in Paris on 10 December 1948 as a common standard of achievements for all peoples and all nations. It sets out, for the first time, fundamental Human Rights to be universally protected.

²⁶ <https://cdn.koc.com.tr/cmscontainer/kocholding/media/koc/01hakkinda/uyum/policies/koc-group-code-of-ethics.pdf>

²⁷ <https://www.un.org/en/universal-declaration-human-rights/>



“Workplace” is where employees work for Company. Such a place can range from physical spaces such as office buildings, factories etc., or virtual workplace which is defined as any work environment that is not located in one physical location.

3. GENERAL PRINCIPLES

As a globally acting Koç Group company, Company, takes the Universal Declaration of Human Rights (UDHR) as its guide, and maintain a respectful understanding of Human Rights for its stakeholders in countries where it operates. Creating and maintaining a positive and professional working environment for its employees is the main principle of Company.

All forms of Discrimination and Harassment, including Sexual Harassment at the workplace are expressly prohibited.

It is among Company’s objectives to provide a working environment that is compatible with human dignity and without Discrimination or injustice and where Company aims to gather individuals with different backgrounds, cultures, career experiences, approaches and perspectives to develop new ideas and solutions. Accordingly, Company makes recruitment decisions based on work needs, work requirements and personal qualifications regardless of race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law.

4. COMMITMENTS

Company is committed to maintain a work environment free of Discrimination and Harassment including Sexual Harassment, where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities.

The key element of Company’s commitment to equal opportunity is zero tolerance for Discrimination and Harassment based on, or because of, an individual's race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law. Such Harassment for any employees, directors and officers of Company or any of its Business Partners, is unlawful and will not be tolerated.

Non-Discrimination

Company cares to treat its employees equally by offering equal remuneration, equal rights and opportunities. All kinds of Discrimination and disrespect founded on race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law are unacceptable.

Zero tolerance towards Discrimination is a key principle in the entire employment process, including recruitment, promotion, assignment, compensation, transfers, discipline, demotions, terminations, access to benefits and training. Company expects all its employees to demonstrate the same sensibility in their behavior towards each other.

Any employee who is found to have discriminatory conduct will be subject to corrective action, up to and including termination. If any Business Partner found to be engaging in any type of unlawful Discrimination, their contracts may be terminated.



Prohibition Against Violence and Harassment, Including Sexual Harassment

A key aspect to safeguarding the personal dignity of employees is to ensure that any form of Harassment or violence does not occur, or if it occurs sanctioned adequately. Company committed to a workplace free of violence, Discrimination and Harassment based on or because of an individual's race, sex (including pregnancy), color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender definition, family situation, sensitive medical conditions, trade union membership or activities and political opinion or other status prohibited by law.

As such, Company does not tolerate any form of physical, verbal, sexual or psychological Harassment, violence, bullying, abuse, or threats.

Harassment may take the form of (but are not limited to) words, gestures, or acts that irritate, alarm, abuse, demean, threaten, belittle, humiliate, or embarrass another person, or that create an intimidating, aggressive, or offensive work environment. Harassment usually implies a series of incidents. Harassment can also be described as unwelcome comments that are gender-related, sexual, or ethnic in nature; religious slurs; racial insults; age-based remarks; jokes, epithets, offensive or derogatory comments, emails, voice mails, or written or pictorial material that makes fun of or insults a person or a group based on a protected classification; or similar inappropriate conduct.

Disagreements about work performance or other work-related issues are not normally considered Harassment.

In addition to the above types of Harassment, Company also has a zero-tolerance principle toward Sexual Harassment in the workplace.

Although Sexual Harassment is most often associated with a pattern of behavior, it may also take the form of a single occurrence. Sexual Harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Any employee who is found to violate these rules will be subject to corrective action, up to and including termination. If this Policy is violated by a Business Partner, their contracts may be terminated.

5. AUTHORITY AND RESPONSIBILITIES

All employees and directors of Company is responsible for complying with this Policy, implementing and supporting the relevant Company's procedures and controls in accordance with the requirements in this Policy. Company also expects and takes necessary steps to ensure that all its Business Partners comply with and/or acts in line with this Policy.

This Policy has been prepared in accordance with the Company Global Human Rights Policy²⁸. If there is a discrepancy between the local regulations applicable in the countries where 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, supersede.

If you become aware of any action you believe to be inconsistent with this Policy, the applicable law or Company Global Code of Conduct²⁹, you should report this incident via the below mentioned reporting channels:

²⁸ <https://www.bekocorporate.com/media/bvbpmtkn/global-human-rights-policy.pdf>

²⁹ <https://www.bekocorporate.com/media/j3an5bth/global-code-of-conduct.pdf>

Web: www.ethicsline.net

Hotline Phone Numbers as listed in the web site:

<https://www.bekocorporate.com/company/about-us/global-code-of-conduct/>

In addition to the channels described you may also report any violation of this Policy to Koç Holding's Ethics Hotline via the following link: "koc.com.tr/hotline".

All allegations of behaviour that violates this policy will be investigated promptly and thoroughly in accordance with the process described in Global Code of Conduct Operations Policy³⁰. Additionally, retaliation, harassment or victimization of anyone raising a concern is not tolerated and individuals making a disclosure will retain their anonymity unless they agree otherwise as described in Global Whistleblowing Policy³¹.

Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by third parties, their contracts may be terminated.

The Legal and Compliance Department is responsible for arranging, periodically reviewing and revising the Global Anti Discrimination and Anti Harassment Policy when necessary as well as training the employees about Global Code of Conduct and Related Policies including the prevention of Discrimination, Harassment including Sexual Harassment and Human Rights violations at the workplace. Human Resources Department is responsible for the implementation of this Policy. Company's employees may consult the Company Human Resources Department for their questions related to the implementation of this Policy.

Version Date: 17.10.2022

³⁰ <https://www.bekocorporate.com/media/qzznjexn/global-code-of-conduct-operations-policy.pdf>

³¹ <https://www.bekocorporate.com/media/53nikhji/global-whistleblowing-policy.pdf>