



POLICY 03 · KRB-POL-03

Equality, Diversity and Inclusion Policy



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3.1 Purpose

The purpose of this Policy is to establish an inclusive working culture at Karub Enerji in which every employee feels safe, valued and included, differences are regarded as an asset, and all human resources and business processes are conducted free from discrimination.

3.2 Scope

This Policy covers all human resources processes from recruitment to separation, daily interactions at the workplace, customer and supplier relations, the physical and digital environments of the workplace and all corporate events organised by the Company. The Policy is binding on all employees, candidates, interns, subcontractor employees and third parties acting on behalf of the Company.

3.3 Legal Basis

- Article 10 (equality before the law) and Articles 49–50 of the Constitution of the Republic of Türkiye
- Article 5 (principle of equal treatment) and Article 30 (obligation to employ persons with disabilities and former convicts) of Labour Law No. 4857
- Articles 3 and 6 (prohibition of discrimination in employment) of Law No. 6701 on the Human Rights and Equality Institution of Türkiye
- Law No. 5378 on Persons with Disabilities and the Accessibility Regulation
- Law No. 6284 on the Protection of the Family and Prevention of Violence against Women
- Article 105 (sexual harassment) and Article 122 (hatred and discrimination) of the Turkish Penal Code
- Prime Ministry Circular No. 2011/2 on the Prevention of Psychological Harassment (Mobbing) at Workplaces
- Equal Opportunity for Women and Men and ILO Conventions No. 100, 111 and 190
- CEDAW and the UN Women's Empowerment Principles (WEPs)

3.4 Prohibition of Discrimination

The Company does not permit direct or indirect discrimination on any ground, including language, race, colour, sex, gender identity, sexual orientation, disability, age, political opinion, philosophical belief, religion, sect and other beliefs, ethnic origin, marital status, pregnancy and childbirth, parental status, trade union membership or activity, health status and socio-economic background.

The prohibition of discrimination applies to all processes, including recruitment, wages and fringe benefits, assignment, training and development opportunities, performance evaluation, promotion, discipline and termination of the employment contract. Positive discrimination measures provided for by law and practices aimed at increasing the employment of disadvantaged groups do not constitute a breach of this prohibition.

3.5 **Prevention of Harassment, Mobbing and Violence**

- ◆ Sexual harassment, psychological harassment (mobbing), bullying, demeaning language, exclusion, systematically withholding work or imposing excessive workloads, physical violence and threats are strictly prohibited at the workplace.
- ◆ The prohibition applies not only to the physical workplace but also to all digital environments including e-mail, messaging applications, video meetings and social media, as well as to business travel and company events.
- ◆ The Company organises awareness training aimed at preventing violence and harassment and provides early intervention guidance for managers.
- ◆ Employees who declare that they are exposed to domestic violence are provided with confidential support, including leave, flexibility in working arrangements and referral assistance.

3.6 **Gender Equality**

- ◆ The Company aims to increase the proportion of female employees and the representation of women in technical and management positions; indicators relating to these targets are monitored regularly.
- ◆ The principle of equal pay for work of equal value is applied; a pay equity analysis is carried out periodically.
- ◆ No disadvantage is created in career progression on account of pregnancy, childbirth or parenthood; return-to-work processes after childbirth are supported.
- ◆ Statutory rights such as maternity leave, nursing leave, the right to part-time work and paternity leave are fully applied and their use is encouraged.
- ◆ University collaborations and internship programmes are run to increase the employment of women in engineering and technical fields.

3.7 **Disability, Accessibility and Reasonable Accommodation**

- ◆ The Company regards meeting the statutory quota for the employment of persons with disabilities as a minimum threshold and aims to go beyond it.
- ◆ Job advertisements and selection and placement processes are designed to be accessible.
- ◆ Accessibility arrangements are made in physical working areas; accessibility standards are observed in digital systems and on the corporate website.
- ◆ Reasonable accommodation measures needed for employees with disabilities to perform their work properly (equipment, adjustments to working hours and location, assistive technologies) are provided to the extent that they do not impose a disproportionate burden.
- ◆ Health information requested is processed solely for accommodation purposes and on a confidential basis.

3.8 **Inclusive Culture and Practices**

- ◆ Managers and employees receive training on unconscious bias, inclusive leadership and inclusive communication.
- ◆ Inclusive and gender-neutral language is used in job advertisements, internal communication texts and visual materials.

- ◆ Wherever possible, diverse evaluation panels are formed for recruitment and promotion decisions.
- ◆ Age diversity is observed; both the development of young talent and the transfer of knowledge by experienced employees are supported.
- ◆ Different beliefs, cultures and lifestyles are respected; flexibility is provided to a reasonable extent.

3.9



Reporting, Investigation and Sanctions

Conduct contrary to this Policy may be reported to the department manager, the Human Resources Department or the Ethics Hotline. Reports are handled without delay and an impartial investigation is conducted. During the investigation, the rights of both the reporting person and the person reported are protected, confidentiality is observed and the right of defence is granted.

Where a violation is established, disciplinary sanctions ranging from a warning to termination of the employment contract are applied according to the seriousness of the act; legal remedies are pursued in respect of acts constituting a criminal offence. Retaliation against persons who make a report in good faith or contribute to an investigation is in itself a serious disciplinary violation.

3.10



Monitoring and Entry into Force

The effectiveness of the Policy is measured at least once a year through gender and age distribution, representation rates at management levels, the number of employees with disabilities, the results of the pay equity analysis, training participation rates and reporting statistics, and is reported to senior management. The Policy enters into force upon approval by the Board of Directors.

PREPARED BY

Legal and Compliance Department

Name – Surname / Signature / Date

APPROVED BY

Board of Directors

Name – Surname / Signature / Date