

NON-DISCRIMINATION AND ANTI-HARASSMENT POLICY

1. Purpose and Scope

Providing a working environment where every employee feels safe and treated equally is a fundamental commitment of KLINGER Turkey with regard to its human resources. Discrimination and harassment do not only harm the person subjected to them; they also directly affect trust within the team and the conduct of business.

This Policy provides further implementation-level detail on the discrimination and harassment provisions of our Human Rights Policy, which constitutes our overarching framework on this subject. It defines which behaviours are unacceptable and sets out the channels available to persons who experience such behaviours. The national legislation to which we are subject and the international frameworks we refer to are defined in our Human Rights Policy.

This Policy covers all activities carried out at our facility in the Istanbul Free Zone and our affiliated offices. It applies to all persons within the scope of our operations, including blue- and white-collar employees employed under any type of employment contract, managers, interns, foreign-national employees, contractors and subcontractor personnel, suppliers, business partners, customers, auditors and visitors. The Policy applies not only in the workplace but also in all work-related settings, including training, business travel, fieldwork and social events, as well as across all communication channels.

2. Our Policy Principles

Prevention of Discrimination

In all processes, including recruitment, remuneration, assignment, access to training, performance evaluation, promotion, disciplinary action and termination of employment, we base our decisions solely on the requirements of the job, merit and performance. Language, race, colour, gender, disability, age, marital status, family responsibilities, pregnancy and childbirth, nationality, ethnic origin, political opinion, philosophical belief, religion, denomination, trade union membership and any other characteristics protected by applicable legislation shall not constitute grounds for any decision. We consider not only direct adverse treatment of a person on the basis of such characteristics to be discrimination, but also apparently neutral practices that place a particular group at a disadvantage.

We do not include references to protected characteristics in job advertisements, job descriptions or internal company announcements. We do not require female candidates to undergo pregnancy tests, nor do we use pregnancy or childbirth as a negative criterion in recruitment or during the continuation of the employment relationship.

We provide reasonable accommodations for our employees with disabilities, ensure an accessible working environment and assign an accompanying person in emergency situations.

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We provide our foreign-national employees with equal treatment in terms of remuneration, social benefits and working conditions.

Prevention of Harassment and Violence

We do not tolerate any unwanted verbal, non-verbal or physical behaviour that undermines a person's dignity or creates an intimidating, humiliating or hostile environment. This includes insults, profanity, ridicule, gossip and defamation.

We consider unwanted sexual advances, requests, insinuations, jokes, looks, messages, sharing of images and physical contact to constitute sexual harassment. Making the acceptance or rejection of such behaviour a factor affecting the employment relationship shall be considered an aggravating circumstance.

We treat systematic and persistent behaviours intended to intimidate or undermine an individual as psychological harassment (mobbing). This includes exclusion, ignoring a person, withholding or cutting off information, continuously non-constructive criticism, assigning an unachievable workload or deadline, and unjustifiably restricting an individual's duties or authority.

Violent, threatening or coercive behaviours are likewise unacceptable. This protection also covers behaviours originating from third parties, such as customers, suppliers, contractors and visitors.

We also consider remaining silent about or ignoring inappropriate behaviour to be unethical. Every employee who witnesses such behaviour is required to report it.

Awareness and Responsibility

New employees are introduced to this Policy during the onboarding process. Our managers are responsible for identifying signs of discrimination and harassment within their teams at an early stage and for promptly referring matters brought to their attention to the Ethics Committee.

3. Identification and Remediation of Non-Compliance

Reports may be submitted directly to the relevant manager, the Human Resources Department, or the Ethics Line at **etik@klinger-turkey.com**. The reporting person may choose whichever channel they prefer. Including the date and location of the incident, the persons involved and, where applicable, any witnesses in the report will facilitate the investigation.

Reports are recorded within twenty-four hours in accordance with our Ethics Line Procedure, prioritised by the Ethics Committee within five business days, and investigated on a confidential basis. Reports may be submitted anonymously. In anonymous reports, the inability to obtain

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additional information may limit the scope of the investigation. Where the reporting person discloses their identity, their information shall not be shared with third parties.

No person who makes a report in good faith, acts as a witness or contributes to an investigation may be subjected to adverse treatment as a result, including termination of employment, changes in duties or shifts, loss of remuneration or benefits, or exclusion. Retaliation constitutes a disciplinary violation in its own right, regardless of the underlying violation reported. Knowingly making a false report is also considered a disciplinary violation.

For substantiated cases, the disciplinary provisions of our Human Resources Procedure shall apply. Depending on the severity of the violation, sanctions may range from a warning to termination of employment. The process shall be conducted by providing the person against whom the report has been made with the right to submit a written defence, and an appeal against the decision may be made within five business days. Where the violation originates from a third party, we request corrective action from the relevant contractor, supplier or business partner and, in serious cases, terminate the relevant contract. In cases involving conduct that may constitute a criminal offence, the victim's right to apply to judicial authorities remains reserved, and exercising this right shall not suspend the company's internal process.

4. Monitoring and Reporting

In order to measure the effectiveness of the Policy, we have established indicators and will begin monitoring these indicators. The indicators we have defined include the number of reports in the categories of discrimination, harassment and mobbing, the number of substantiated cases, and the rate of reports concluded. The results shall be evaluated during management review meetings. Our improvement targets relating to these indicators will be established after data from the first full monitoring year has been obtained.

This Policy shall enter into force upon approval by the General Manager. It shall be communicated to all employees, provided to employees upon commencement of employment, shared with our contractors and suppliers, and published on our company website. The Policy shall be reviewed at least once a year and additionally following any legislative change, organisational change or significant incident.