

	Anti-Harassment and Anti-Violence Policy	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

1. PURPOSE and SCOPE

ATAŞ adopts zero tolerance approach against abuse and violence in order to prevent acts of abuse and violence. This anti-harassment and anti-violence policy (“Policy”) includes ATAŞ’s undertakings related to its fight against abuse and violence.

This policy covers all ATAŞ employees, directors and stakeholders.

This Policy constitutes an integrity with ATAŞ Ethical Principles, values and work culture.

2. DEFINITIONS

- **ATAŞ or Company:** Avrasya Tüneli İşletme İnşaat ve Yatırım A.Ş.
- **ATAŞ Ethics Line:** Independent reporting line for reporting violations, irregularities or suspicions regarding ATAŞ Ethical Principles (E-mail: avrasyatuneli@speak-hub.com, Telephone: 02128006588)
- **ATAŞ Ethical Principles:** Ethical principles with which ATAŞ, its employees and stakeholders are required to comply, specified by the document entitled Ethical Principles / Code of Conduct issued by ATAŞ
- **Top Management:** CEO (General Manager), CFO (Deputy General Manager), CTO (Deputy General Manager) or management personnel to be designated by ATAŞ’s board of directors from time to time

3. PRINCIPLES AND UNDERTAKINGS

ATAŞ:

- ◇ adopts **zero tolerance approach against any type of abuse.**
 - fights against all kinds of physical, sexual, psychological, verbal or non-verbal, systematic, etc. harassment, bullying, abuse and violence, does not tolerate such behaviors.
 - does not tolerate any mistreatment and inhuman behaviours, including gender-based violence, physical violence, sexual violence, psychological violence, mobbing, economic violence or cyberbullying.
 - protects its employees against all acts of violence and abuse, whether verbal or nonverbal, whether written or printed.
- ◇ takes all kinds of actions to prevent sexual abuse or violence or other types of abuse or violence at the workplace.
- ◇ With the perspective of not victimising the victim again, it protects confidentiality at every stage, including the complaint process, carries out the necessary procedures and provides the

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appropriate environment in order to support employees who have been subjected to harassment and violence and to prevent them from suffering further harm. Makes unbiased evaluation of complaints related to sexual abuse and sexual assault by following the principles of maximum confidentiality. Initiates legal proceedings based on the situation and the victim's request.

- ◇ adopts a **comprehensive, fair and safe working environment** and corporate culture.
- ◇ creates a working environment far from pressure and violence, monitors and evaluates risks in its activities and takes any necessary measures to reduce these risks.

4. AUTHORITY AND RESPONSIBILITY

All ATAŞ employees, including Top Management, must comply with this Policy.

All ATAŞ employees are responsible for ensuring that the Company's procedures and practices comply with this Policy and avoiding any activities and practices that are contrary to the principles and commitments of this Policy.

ATAŞ expects and demands that all its stakeholders, including its suppliers, act in compliance with the principles and commitments set forth in this Policy.

ATAŞ undertakes that this Policy is binding for all business processes in which it operates and that it will act in accordance with this Policy.

5. AGAINST VIOLATIONS

You should report any acts or actions you think are violating this Policy to [ATAŞ Ethics Line](#). All applications to ATAŞ Ethics Line, including suspected violations, will be reviewed confidentially and with great care in accordance with ATAŞ's policies, procedures and operational rules.

ATAŞ protects the people who report to this line, and within this scope, works with independent third parties to operate this line. Those reporting to this line shall not be disclosed. Except for intentionally false statements, ATAŞ does not retaliate against any employee or stakeholder or take any counter-action for any notifications made within this scope.

Violation of this Policy by an employee may result in disciplinary action up to and including termination of employment. In the event that any stakeholder expected to act in accordance with this Policy acts in violation of this Policy, this may result in termination of the business relationship with ATAŞ or termination of relevant contracts.

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6. EFFECTIVE DATE and APPLICATION

This Policy was adopted by Top Management on the effective date stated above and entered into force as of this date. ATAŞ may revise or amend this Policy after its effective date if any need is identified.

ATAŞ employees may consult Human and Culture Department for any questions related to application of this Policy.

ATAŞ regularly reviews and reports its commitments, efforts and declarations within the scope of this Policy as part of its periodic sustainability report.

This Policy is available to all employees, stakeholders and the public in Turkish and English on the ATAŞ website and the internal documentation system.