

	<b>Equity, Diversity and Inclusion Policy</b>	Effective Date:	31.12.2024
		Revision Date:	-
		Revision No:	0

## 1. PURPOSE and SCOPE

Assuming all kinds of responsibility on equality, diversity and inclusion and promoting awareness of every employee on this subject are some of the most fundamental values of ATAŞ. This equality, diversity and inclusion policy ("Policy") includes ATAŞ's equity, diversity and inclusion undertakings.

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](mailto: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
- **UN Global Impact:** The contract based on universally adopted declarations by United Nations that addresses basic areas of responsibility in the areas of human rights, work standards, environment and anti-corruption and that aims to encourage sustainable growth and corporate social responsibility by setting ten basic principles accordingly.
- **Human Rights:** Universal, inalienable and equal rights that all people have innately, regardless of their gender, race, color, religion, language, age, nationality, thought or property, including the right to life, freedom, equality, the right to education, the right to a fair trial, freedom of thought and expression
- **Universal Declaration of Human Rights:** Basic document that sets universal human rights standards and emphasizes that Human Rights must be protected universally, which was adopted and proclaimed by the General Assembly of the United Nations as a common criterion of achievement for all human beings and all nations on 10 December 1948
- **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:

- ◇ acts in accordance with the United Nations Global Compact, which is considered an important reference in creating common universal grounds regarding ethics and values.
- ◇ undertakes to take decisions on the basis of the Universal Declaration of Human Rights in all its processes, organize all its operations in this direction and **not to be a partner in crime of Human Rights violations** in any manner.
- ◇ is committed to the principles of equality, diversity and inclusion in all its operations and reflects such commitment in all its business processes.

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- ◇ gives priority to **equality and equal opportunity**.
- ◇ **values the diversity of ideas, individual differences and diversity provided by employees**, and encourages them for their enrichment.
- ◇ respects differences of opinion and places emphasis on effective communication, **allows and respects its employees to express their ideas freely**.
- ◇ does not make discrimination on the basis of sex, race, ethnicity, religion, language, color, age, sexual orientation, disability or differences of opinion in any of its respective processes, particularly including recruitment, promotion training, other job opportunities, and exercises fair judgment.
- ◇ values providing necessary conditions for emergence of diversity in age, sex, culture and ideas in the working environment.
- ◇ cares about and encourages participation of women in the workforce.
- ◇ values gender-equal society and encourages all employees on this subject.
- ◇ fights against all kinds of physical, sexual, psychological, verbal or non-verbal harassment, bullying, abuse or violence, does not tolerate such behaviors and adopts zero tolerance approach against all kinds of abuse.
- ◇ monitors and evaluates environmental and social risks in its activities and takes the 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

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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.

## 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.