

ALWAYS ON YOUR SIDE AGAINST VIOLENCE

Zorlu Holding

Domestic Violence

Prevention Policy

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1. PURPOSE

As Zorlu Holding A.Ş. and its direct or indirect affiliated group companies (hereinafter referred to as “Zorlu Holding”), we prioritise the physical and psychological health and safety of our employees. The purpose of this policy is to set out the principles and sanctions for creating an egalitarian and safe business environment at Zorlu Holding, which is intolerant to any kinds of violence. In line with this purpose, Zorlu Holding undertakes to make efforts to raise awareness against domestic violence among its employees, establish support and assistance mechanisms through which its employees and their children who are exposed to domestic violence can report their situation in a safe and confidential manner, and operate an effective review and inspection and sanction mechanism.

2. DEFINITIONS¹

2.1. Victim of Violence is a person who is directly or indirectly exposed, or at risk of being exposed, to attitudes or behaviours defined as violence, and persons who are affected, or at risk being affected, by violence.

2.2. Perpetrator is a person who practices, or threatens to practise, attitudes or behaviours defined as violence.

2.3. Domestic Violence is all kinds of physical, sexual, psychological, economic, and cyber violence practiced among members of a family or household or among persons who are deemed to be indirect family members, even if the victim and the perpetrator do not live in the same household.

2.4. Violence is all kinds of physical, sexual, psychological, verbal or economic attitudes and behaviours practiced in a social, public, private or cyber sphere, which result in, or may potentially result in, physical, sexual, psychological or economic suffering of the victim, including any related threats, coercion or arbitrary obstruction of freedom.

Physical Violence is actions of deliberate physical violence against a person (e.g. pushing, hitting, raising hand to hit, slapping, punching, threatening with sharp objects, injuring, throwing objects, etc.).

Sexual Violence is forcing a person to engage in any sexual act against his or her will, or practising any abuse, threatening, insult or assault with sexual content on a person. (In sexual relationship, the will and approval of all parties is the essential basis. In addition to physical abuse and rape, the definition of sexual violence also includes forcing a person to engage in any sexual act against his or her will through psychological pressure or threatening. All such acts are still considered as sexual violence, when they are committed in written or verbally or in a virtual environment.)

Psychological Violence is deliberate acts to seriously damage a person’s psychological through coercion or threatening (e.g. threatening, verbal abuse, humiliation in the presence of other persons, contempt, controlling or restricting the dressing, behaviours, or relationships of the victim, threatening the victim with his or her relatives or children, if any, etc.).

Economic Violence is acts to make systematic pressure on a person’s economics decision and restrict his or her economic space (e.g. controlling or seizing the income of the victim, damaging or seizing the victim’s properties, etc.).

Cyber Violence is acts to control, threaten, or track a person through e-mails, text messages, phone messages or other similar digital means.

¹Definitions of the terms given under this title have been taken from the Law on the Protection of Family and Prevention of Violence against Women of Turkey, with Law number 6284.

2.5. Abusive Stalking is insistent threatening behaviours directed at a person, which causes him or her to feel unsafe.

2.6. Stalking is repeated intentional and threatening conduct directed at another person, causing him or her to fear for his or her safety.

2.7. Sexual Abuse is all kinds of undesired verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular in a way to create an intimidating, hostile, degrading, humiliating or offensive environment.

2.8. Violence Prevention and Monitoring Centres are centres operating on the 7/24 basis in order to provide support and monitoring services for the prevention of violence and effective implementation of related protective and preventive measures.

3. SCOPE

The scope of this document includes the methods and practices against domestic violence. All Zorlu Holding employees are expected to act in accordance with the rules and principles described in the following sections, in cases of domestic violence.

4. RESPONSIBILITY

All units of Zorlu Holding are obliged to implement this procedure, while it is the Human Resources Group Directorate's responsibility to monitor the implementation of this procedure and update it when necessary.

This document, initially published on 25th of November 2020, is revised by the employer when necessary. The Human Resources Group Directorate is entitled to modify the document.

The current version of the document can be accessed at Zorlu Holding (<http://www.zorlu.com.tr/en/corporate/our-commitments>) website.

5. THE POLICY

Zorlu Holding is aware of the fact that domestic violence constitutes a major problem in Turkey. It is well known by Zorlu Holding that domestic violence may negatively affect the physical and mental health of victims, as a result of which they may experience various problems including low performance and productivity in their professional lives. In this context, Zorlu Holding ensures that victims of violence do not suffer any loss of rights in their professional lives and careers within the company. **No type of violence including physical, economic, social, psychological and cyber violence is tolerated at Zorlu Holding.**

Zorlu Holding takes the necessary measures to create an environment where employees may report any incidence of violence without hesitation in case that they are personally subjected to violence and/or when they become aware that any of their colleagues has been a victim or perpetrator of violence. Zorlu Holding specifies the steps to be taken and the authorities to be contacted with, and implements the relevant sanctions in line with the laws and internal regulations of the company.

In addition to directing victims of domestic violence to the relevant social institutions, Zorlu Holding provides them with the support specified in article 6 of this Policy, through the human resources department.

It is essential for all Zorlu Holding employees to avoid any act or behaviour that may be considered as domestic violence.

6. IMPLEMENTATION OF THE PROCEDURE

In any case, Zorlu Holding manages the processes of domestic violence, in cooperation with the victims of violence. While providing any possible support in order to ensure that employees are protected from domestic violence, it manages the whole process by prioritising the privacy of victims and employees under risk, by taking their consents and without sharing information with any third persons. Only when it is needed for the safety of the victim and the workplace, relevant corporate units and/or government institutions are notified after the consent of the employee is taken.

Zorlu Holding encourages violence victims and other employees to contact with relevant social institutions for having access to the potential sources of support and advice. The official channels listed below, which violence victims may apply, are open to application by anyone.

External channels of support:

For complaints and reporting:

- Governorship - District Governorship
- Police Stations
- Gendarmerie Stations
- Judicial Authorities (Chief Public Prosecutor's Office and Family Courts)
- Provincial Directorates of Family, Labour and Social Services
- Violence Prevention and Monitoring Centres (ŞÖNİM)
- Health Institutions
- The Women Emergency Assistance Notification System (KADES) mobile application

Emergency lines:

- 155, Police
- 156, Gendarmerie
- 183, Social Support (Communication Centre of the Ministry of Family, Labour and Social Services)
- 112, Emergency Call

For medical treatment and medical reports evidencing violence:

- Health Institutions

For counselling, support, shelter and financial aid:

- Provincial Directorate of the Ministry of Family, Labour and Social Services (Shelter Services, Support and Counselling)
- Violence Prevention and Monitoring Centres (ŞÖNİM)
- Social Service Centres
- 183 for the Social Service Consultation Line (operating on the 7/24 basis)
- Bar Associations and Women's Rights Centres Affiliated to the Bar Associations
- Municipalities (Shelter Services, Support and Counselling, Financial and In-Kind and Aids)
- Governorship, District Governorship
- 144 for the Social Assistance Line (Hotline that provides information and assistance to citizens applying for social assistance programs, including assistance for the hearing impaired.)
- The Women Emergency Assistance Notification System (KADES) mobile application

Internal support channels:

Immediate manager of the victim

- Human resources department
- Corporate Ethical Reporting Lines: ✉ etik@zorlu.com ☎ : 0 212 456 23 23 / 0850 226 23 23
- Domestic Violence Hotline of the Federation of the Women Associations of Turkey: 0212 656 96 96 / 0549 656 96 96

6.1 THE SUPPORTS FOR EMPLOYEES WHO ARE THE VICTIMS OF DOMESTIC VIOLENCE

Zorlu Holding provides the following supports upon the request of an employee who has been a victim of domestic violence:

- a. Paid leave is given to the employee in order to allow him or her to deal with various actual problems such as accessing to security and protection services, finding a new home, and receiving counselling or medical services. During this period, the employee can be allowed to arrange his or her working hours flexibly, work part-time or work remotely.
- b. The employee can be given therapy support through the services of the psychologists on the “Birlikte İyiyiz” platform or a competent external psychologist..
- c. The victim may need to move to a new house and take legal action. In such a case, the company may provide a package of financial aid to the victim. In parallel with the needs of the victim, the scope of the package is determined by the human resources department in favour of the victim.
- d. The legal department of the company, or any contracted law office, can guide the employee in contacting with the relevant organisations or institutions where he or she can have access to additional resources of support.

6.2 SECURITY PLAN FOR VICTIMS OF DOMESTIC VIOLENCE

In order to help employees getting protected from domestic violence, Zorlu Holding will take necessary actions to ensure the security of victims, when demanded. Since the victim is the person who can best foresee the threats and dangers directed at him or her, the related security plan is developed jointly with the victim, if violence was committed at the workplace.

When Zorlu Holding is defined as a security zone for an employee who has been granted a temporary or permanent protection decision by a court, he or she should submit a petition and one copy of the court order to the human resources department of the company. In addition, the employee should provide the company security unit with the necessary information about the abuser.

Company human resources departments, as the decision maker for related actions, may or may not decide to take various actions including but not limited to the following when necessary in order to ensure security of the victim.

- a. To change the routes or transportation means used by the victim to commute to work.
- b. To prevent the contact of the perpetrator with the victim at the workplace or during commuting to work.
- c. To ensure that the security staff accompany the victim until he or she reaches his or her private car and/or public transportation.
- d. To move the work area of the victim to a safe location, if requested and consented by the victim.
- e. To change payment methods for the wage and benefits of the victim in his or her favour, in order to prevent the access of the perpetrator to such payments.
- f. To ensure that necessary measures are taken by sub-employers, sub-employers providing security services are trained in awareness against violence, and such measures are included in the security plans.

6.3 THE SUPPORT FOR EMPLOYEES WHO BECOME AWARE OF OR OBSERVE DOMESTIC VIOLENCE AGAINST OTHER EMPLOYEES

Employees are recommended to report to the human resources department when they recognize signs of domestic violence against another employee. An employee who becomes aware that a colleague has been subjected to violence is recommended to inform the victim about the relevant support channels and to encourage him or her to contact with the institutions and communication lines specified in Section 6.

6.4 EMPLOYEES WHO COMMIT OR THREATEN TO COMMIT DOMESTIC VIOLENCE

When the resources of the workplace (telephones, fax machines, e-mail facilities, mails, office equipment, photocopy machines, vehicles etc.) are used in committing or threatening to commit domestic violence, or when the perpetrator and the victim work at the same workplace, the following actions can be taken by Zorlu Holding:

- a. To direct both the victim and the perpetrator to a process of rehabilitation or psychological support, if they consent to.
- b. To transfer the victim to another workplace, upon his or her request and consent.
- c. To take suitable legal actions against the perpetrator based on the severity of the case and by evaluating the actual conditions, such as sending him or her for annual paid leave, and terminating his or her labour contract with valid reason.

7. TRAINING

An important strength in minimising violence at workplace is a workforce trained in detecting situations that may cause violence at workplace, dealing with such situations and reporting violence related cases to the relevant units. Zorlu Holding develops and implements training programs to raise awareness among its employees about the methods and directives to be applied for detecting and decreasing the violence intervening in such situations.

Legal Sanctions and Regulations

Whenever possible, Zorlu Holding will cooperate with competent authorities. This policy has been developed by the policy development team consisting of members from the human resources, legal, auditing and corporate communication departments of Zorlu Holding.