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SAFETY • FIRE • ENVIRONMENT

EQUALITY, DIVERSITY AND INCLUSION (EDI) POLICY

This policy is aligned with the ISO 30415 standard and is implemented in an integrated manner with ISO 45001, ISO 14001, ISO 27001, and ISO 21001 management systems.

REVISION

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EQUALITY, DIVERSITY AND INCLUSION (EDI) POLICY

As NTSS, we are committed to promoting equal opportunities, creating an inclusive and diverse working environment, and preventing unlawful discrimination in employment and in our dealings with customers and suppliers.

We recognise that our employees, customers and suppliers have different characteristics, experiences, needs and expectations. We acknowledge that individuals with diverse backgrounds, skills, attitudes and experiences bring new ideas and perspectives. Understanding, valuing and effectively managing these differences provides benefits at individual, team and organisational levels.

We are committed to creating an inclusive working environment where individual differences are valued and respected, and where every employee can realise their potential and maximise their contribution.

We aim to ensure equal opportunities and equal treatment for all employees and job applicants. We seek to ensure that no individual is treated less favourably or placed at a disadvantage due to unjustified practices on the grounds of age, disability, gender, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

A key element in ensuring equality of opportunity in employment is creating a working environment in which everyone is treated with dignity and respect in line with our core values, and which is free from all forms of harassment and bullying. Our organisation has zero tolerance for any form of bullying, harassment or discrimination.

This policy has been developed to support the implementation of our commitments. Compliance with this policy is also intended to prevent employees from engaging in unlawful acts of discrimination. For detailed guidance on harassment, sexual harassment and bullying, reference should be made to our Anti-Harassment and Bullying Policy.

This policy does not form part of any contract of employment and does not confer any contractual rights.

1.Definitions

Equality: Refers to everyone being treated fairly and is generally associated with applicable legislation.

Diversity: Refers to the presence of differences among individuals.

Inclusion: Refers to a culture in which diverse individuals can participate in the workplace, feel comfortable and confident, be themselves, and work in a way that meets business needs. Inclusion ensures that everyone is valued and able to contribute.

Bullying: Unwanted behaviour by an individual or group that makes a person feel uncomfortable, humiliated, undermined or threatened.

Harassment: Unwanted conduct related to protected characteristics such as sex, gender reassignment, race (including colour, nationality, ethnic or national origin), disability, sexual orientation, religion or belief, and age, which violates a person's dignity or creates an intimidating, hostile, degrading or offensive environment.

Sexual Harassment: Unwanted verbal, non-verbal or physical conduct of a sexual nature. Such behaviour may violate a person's dignity or create an intimidating, hostile, degrading or offensive environment. A single incident may constitute sexual harassment. Less favourable treatment of a person for accepting or rejecting such conduct is also considered sexual harassment.

2. Legal Framework

Direct or indirect discrimination in recruitment or employment processes on the following grounds is unlawful:

- Age
- Disability
- Sex
- Gender reassignment
- Pregnancy and maternity
- Race (including colour, nationality, ethnic or national origin)
- Sexual orientation
- Religion or belief
- Marriage or civil partnership

These characteristics are referred to as "protected characteristics."

Discrimination may also be unlawful after employment has ended (for example, refusing to provide a reference).

Employees must not discriminate against or harass current or former employees, job applicants, customers, suppliers or visitors. This applies in the workplace, outside the workplace (including customer and business interactions), and at all work-related events.

Employers have a duty to make reasonable adjustments to facilitate access to services for individuals with disabilities. This includes removing physical barriers, making necessary adaptations, and addressing factors that hinder access to services. Service providers are also expected to anticipate potential barriers to access and take appropriate measures in advance.

3. Types of Unlawful Discrimination

Direct Discrimination: Occurs when a person is treated less favourably because of an actual or perceived protected characteristic. For example, not hiring a woman because she is pregnant constitutes direct discrimination.

Associative Discrimination: Occurs when a person is treated less favourably because of their association with someone who has a protected characteristic.

In limited circumstances, employers may apply direct discrimination where there is a genuine occupational requirement for a particular role linked to a protected characteristic. However, such a requirement must be essential for the role and a proportionate means of achieving a legitimate aim.

Indirect Discrimination: Occurs when an apparently neutral provision, criterion or practice places individuals with a particular protected characteristic at a disadvantage compared to others, and it cannot be justified as a proportionate means of achieving a legitimate aim.

Harassment: Unwanted conduct related to a protected characteristic (excluding marriage/civil partnership and pregnancy/maternity) that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. Whether or not the effect was intended is irrelevant.

Associative Discrimination: Occurs when a person experiences discrimination or harassment due to their association with another individual who has a protected characteristic.

Perceptive Discrimination: Occurs when a person is discriminated against or harassed because they are perceived to have a protected characteristic, even if they do not actually possess it.

Victimisation: Occurs when an employee is subjected to a detriment because they have made or supported a complaint under relevant legislation, or are suspected of doing so (for example, being denied training or promotion opportunities). However, individuals who make malicious or false complaints are not protected.

Failure to Make Reasonable Adjustments: Occurs when a physical feature, rule or practice places a disabled person at a substantial disadvantage, and the employer fails to take reasonable steps to remove or reduce that disadvantage.

4. Objectives

We have established the following objectives:

Equality

- To avoid unlawful discrimination in all aspects of employment, including recruitment, promotion, training opportunities, pay and benefits
- To limit job and candidate requirements to criteria that are necessary for the

effective performance of the role

- To assess candidates in recruitment and promotion processes based on suitability, competence and qualifications
- Not to use disability status or personal/family responsibilities as decision-making criteria unless genuinely required
- To provide a working environment free from harassment and bullying, based on dignity and respect

Diversity

- To analyse the existing diversity within the organisation (e.g. pay gaps, surveys, etc.)
- To clearly communicate the link between diversity and organisational values and objectives
- To take positive steps to enhance diversity in recruitment and selection processes
- To measure, report and set targets for diversity and inclusion performance

Inclusion

- To create an inclusive working environment through a diversity working group
- To understand and support the needs of individuals with different requirements
- To take action by analysing employee feedback
- To review policies and procedures to ensure they address the diverse needs of employees, customers and stakeholders

5. Dignity at Work / Bullying and Harassment

A separate policy is in place addressing bullying and harassment (including sexual harassment). How such matters are to be handled is set out in detail within that policy.

6. Customers, Suppliers and Non-Employees

Unlawful discrimination will not be carried out against customers, suppliers or visitors who use or seek to use the products, services and facilities provided by our organisation.

If you believe that you have been subjected to bullying or harassment by a customer, supplier, visitor or any third party, you must report the matter to your manager immediately. It is important that you do not attempt to resolve such situations yourself and allow your manager to take the necessary action.

7. Responsibility

To ensure the effective implementation of this policy, a senior management representative has been appointed with overall responsibility for its application. This individual ensures the implementation of the policy within their areas of responsibility and addresses any arising issues, seeking support from relevant departments where necessary.

A Diversity Working Group has been established to support the effective implementation of this policy and is responsible for proposing and implementing necessary actions.

The provision of expert advice, training, guidance and necessary reporting related to the implementation of the policy is the responsibility of the relevant departments.

Within this scope, the following actions have been defined:

- Taking appropriate action under the disciplinary procedures against employees who breach this policy
- Providing necessary guidance and training, particularly for managers
- Informing employees of their responsibilities under this policy
- Monitoring the effectiveness of the policy and regularly reviewing its implementation processes.

8. Roles and Responsibilities

All employees (including remote workers; whether full-time, part-time, fixed-term or temporary) are required to comply with this policy.

In this context, employees are expected to:

- Understand and apply the policy
- Be aware of the impact of their behaviour on others
- Recognise different forms of discrimination and avoid them
- Challenge inappropriate behaviour
- Report incidents of harassment and bullying.

Managers are additionally responsible for:

- Ensuring the implementation of the policy
- Demonstrating appropriate role model behaviour
- Creating a supportive working environment

- Addressing inappropriate behaviour
- Escalating complaints to the relevant departments without delay
- Ensuring that necessary investigations are carried out
- Taking appropriate action in cases of breaches

Relevant departments are responsible for:

- Informing employees
- Providing guidance
- Organising training
- Monitoring the effectiveness of the policy

Employees are encouraged to disclose any disabilities to their managers or relevant departments so that appropriate support can be provided.

9. Monitoring and Review

This policy is regularly monitored to assess its effectiveness and updated in line with changes in legislation.

Personal data collected for the purpose of assessing equal opportunities is processed in accordance with data protection policies. Details regarding the use of such data are set out in the Employee Privacy Notice.

10. Training

All employees receive training on equality, diversity and inclusion as part of the onboarding process.

Managers are responsible for setting appropriate standards of behaviour, acting as role models, and ensuring that their teams act in accordance with this policy.

11. Complaints

If you believe that you have been subjected to harassment, bullying or victimisation, you may raise a complaint under our Anti-Harassment and Bullying Policy or in accordance with the relevant procedures.

No individual who raises a complaint of discrimination in good faith will be subjected to victimisation or any form of adverse treatment.

However, allegations made in bad faith or found to be false will be addressed under the Disciplinary Procedure and may result in disciplinary action, including dismissal.

12. Breach of This Policy

All employees are required to comply with this policy, and any breach will be treated very seriously.

Breaches committed by an employee may be considered gross misconduct and may result in disciplinary action under the Disciplinary Procedure, including summary dismissal.

In the event that non-employees, suppliers or third parties fail to comply with this policy, NTSS reserves the right to terminate its business relationship with the relevant individual or organisation immediately, without notice or compensation.

Individuals who engage in unlawful discriminatory conduct may be held personally liable for any resulting compensation claims.

If you believe that this policy has been breached, you are encouraged to raise your concerns with your manager as soon as possible.

13. Customers and Service Providers

NTSS generally reserves the right to select its customers. However, no customer shall be denied services on the basis of a protected characteristic.

Services provided to customers and prospective customers are delivered in accordance with applicable equality legislation. Where appropriate, lawful positive action measures may be applied.

All employees, suppliers, representatives and other third parties are selected solely on the basis of job requirements, merit and suitability. No discrimination is permitted in these processes.

14. Scope of Application and Legal Compliance

Although this policy has primarily been prepared with reference to Turkish legislation, NTSS is committed to complying with the laws and regulations in force in all countries in which it operates.

The policy shall be interpreted and applied, as far as possible, in accordance with applicable legal requirements. Where necessary, NTSS reserves the right to depart from the provisions of this policy in order to ensure compliance with legal obligations.

APPROVED BY

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