

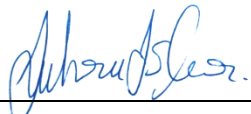

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NTSS EĞİTİM VE DANIŞMALIK LTD. ŞTİ.

EQUAL OPPORTUNITY POLICY



TS EN ISO 9001:2015

QUALITY MANAGEMENT SYSTEM

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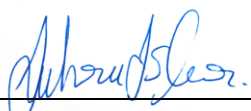

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1. Equal Opportunity Policy

NTSS Training & Consultancy is an Equal Opportunity employer.

NTSS Training & Consultancy has in place corporate policies, in accordance with government legislation, which ensure that employees and consultants are not discriminated against.

All employees and consultants are made aware of their obligations under the relevant Anti-Discrimination legislation.

NTSS Training & Consultancy is committed to preventing unlawful discrimination, sexual harassment, victimization and vilification in its workplaces. It is also committed to preventing bullying.

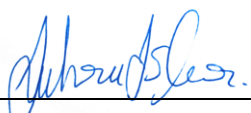

Each of NTSS Training & Consultancy's workplace participants is required to ensure that they do not unlawfully discriminate, harass, victimize, vilify or bully any other workplace participant.

For the purposes of this policy, a workplace participant is:

- All employees of NTSS Training & Consultancy (including non-permanents);
- Contractors to NTSS Training & Consultancy;
- Applicants for jobs with NTSS Training & Consultancy; and
- People who work in the same workplace but for a different employer.

A failure to comply with this Equal Opportunity Policy may result in disciplinary action up to and including dismissal.

It is the responsibility of all NTSS Training & Consultancy management and staff to treat all workplace participants and equipment with courtesy and respect and to behave in accordance with this policy.

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NTSS Training & Consultancy supports the concept of equal opportunity in employment and is committed to a program, which will ensure compliance with both the letter and the spirit of the relevant legislation.

NTSS Training & Consultancy believes all workplace participants should be treated with respect and fairness and that everyone will be afforded natural justice.

NTSS Training & Consultancy values and respects the diversity of its workforce. The Company believes that diversity creates a competitive advantage and enhances employee participation.

2. POLICY OBJECTIVES



The objectives of this Equal Opportunity Policy are to:

- Ensure a work environment free from discrimination, harassment, victimisation and vilification for all workplace participants;
- Ensure that bullying does not occur;
- Provide a procedure for dealing with complaints of discrimination, harassment, victimization, vilification or bullying if they occur;
- Provide information to all workplace participants in relation to their rights and responsibilities concerning discrimination, harassment, victimization and vilification in the workplace; and
- Ensure that employment is based on the principle of merit and that employees are not treated less favorably on the basis of an irrelevant characteristic during the course of employment.

3. WHAT SITUATIONS ARE COVERED BY THIS POLICY?

This policy aims to prevent discrimination, harassment, victimization and vilification in the workplace. This can occur:

- During recruitment;

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- In the course of employment at any location;
- In the termination of employment; and
- At work related functions (e.g. Happy Hour);

Further, when using labour hire or temporary staff, NTSS Training & Consultancy will request that the agencies being used apply non-discriminatory screening and interviewing processes to ensure selection is from a diverse pool of candidates. This ensures NTSS Training & Consultancy employs the best person for the position.

4. WHAT IS UNLAWFUL DISCRIMINATION?

Discrimination is essentially any practice that makes distinctions between individuals or groups, so as to disadvantage some and advantage others. National legislation prohibits both direct and indirect discrimination on various grounds.



Direct discrimination is when a person, or group of people, receives less favourable treatment than others on the basis of:

- Personal attributes
 - √ Age
 - √ Race
 - √ Sex
- Personal characteristics, particular to people with one of the above mentioned attributes

Indirect discrimination is the imposition of a condition on a person, or group of people, which, on face value appears not to be discriminatory, however it has an adverse effect on a particular group of people.

A person indirectly discriminates against another person or group when:

- They are required to comply with a particular condition which a substantially higher proportion of people cannot comply

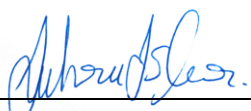

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- The condition is not reasonable having regard to all circumstances

NTSS Training & Consultancy adheres to National legislation, which prohibits discrimination in employment on the following grounds:

- Sex
- Creed
- Mental, intellectual or psychiatric impairment
- Physical impairment, Disability Discrimination
- Pregnancy or potential pregnancy
- Race, nationality or ethnic origin
- Marital status
- Family responsibilities and status as a parent or carer
- Disability
- Age
- Sexuality/sexual orientation
- Transgender or gender identity
- Trade union activity
- Religion and/or Political opinion
- Medical record
- Irrelevant criminal record
- Physical features
- Breast feeding in the work place
- Lawful sexual activity

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- Association with a person who has such characteristics

Discrimination on any of these grounds is prohibited in all areas of employment, including:

- Recruitment
- Terms and conditions of employment
- Access to promotion, transfer or training or other employment benefits
- Unfavorable treatment
- Appropriate workplace behavior
- Termination of employment
- Commission agents
- Contract workers; and
- Casual and part-time workers

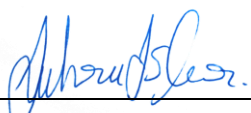

NTSS Training & Consultancy aims to provide equal opportunity for all workplace participants and to comply with all anti-discrimination laws.

Discrimination by one workplace participant against another will not be tolerated. A workplace participant who discriminates against another may be subject to disciplinary action up to and including dismissal.

Discrimination can occur either directly or indirectly.

Direct discrimination is any action, which specifically excludes a person, or a group of people from a benefit or opportunity, or significantly reduces their chances of obtaining it because a personal characteristic, irrelevant to the situation, is applied as a barrier. That is, a person, (or group of people) is treated less favorably because they possess a characteristic listed as a reason for discrimination, e.g. age, sex, race, disability or marital status.

Indirect discrimination occurs when an action, policy or practice appears to treat people equally, but actually disadvantages a person or group of people, and those people are

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disadvantaged because of their sex or their race or one of the other prohibited grounds of discrimination.

Indirect discrimination occurs where there is a requirement, rule, policy, practice or procedure that is the same for everyone but has an unequal effect on particular groups. This type of requirement is likely to be indirect discrimination unless the requirement is reasonable in all the circumstances.

5. WHAT IS SEXUAL HARASSMENT?

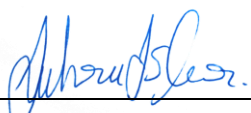

Sexual Harassment is defined as any uninvited, unwelcome behaviour of a sexual nature involving written, visual or physical affront against another person. Sexual harassment may include:

- Requests for sexual favors;
- Leering, unwanted physical contact, wolf-whistles, obscene gestures or noises;
- Persistent requests for a social "date";
- Sending or displaying to other workplace participants pornographic pictures or jokes by email;
- Comments or questions about a person's sex life;
- Offensive posters, pictures or graffiti;
- Sexual jokes, sexually suggestive telephone calls;

Sexual harassment within the Company will not be tolerated and any workplace participant who sexually harasses another will be subject to disciplinary act including dismissal.

6. WHAT IS VICTIMISATION?

Victimization is the term used to describe any paybacks, retribution or intimidation associated with a discrimination or harassment complaint. Victimization refers not only to intimidation

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of complainants or potential complaints, but also to the alleged harasser or discriminator, witnesses, supporters and those resolving or investigating any complaints.

NTSS will take all reasonable steps to ensure victimization does not occur. Workplace participants found guilty of victimization will be subject to disciplinary action up to and including dismissal.

7. WHAT IS VILIFICATION?

Vilification is a public act which incites, encourages or urges others to hate, have serious contempt for, or severely ridicule, a person, or group of people because they are (or thought to be) members of a particular group. Acceptable forms of lawful free speech will not include any form of vilification.

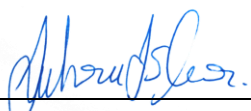

Any workplace participant that vilifies another workplace participant will be subject to disciplinary action up to and including dismissal.

8. RACISM

NTSS Training & Consultancy is firmly committed to providing a working teaching and learning environment that is free from racism. Racism not only denies a person's fundamental human right to respect, it reduces their opportunity to gain a fair share of society's valued resources such as education and employment.

NTSS Training & Consultancy recognizes that the achievement of equal employment opportunities and equal educational outcomes is dependent on the provision of a discrimination and harassment free environment. NTSS Training & Consultancy recognizes the community's racial and ethnic diversity.

NTSS Training & Consultancy expresses unconditional rejection of racist behavior and its commitment to eliminate racism in its organizational structure through the provision of training programs that are equitable, accessible and culturally inclusive.

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9. BULLYING

Workplace participants are expected to treat each other with dignity and respect. NTSS Training & Consultancy values individual differences and expects that all workplace participants will work together.

Bullying is inappropriate behavior aimed to demean and humiliate workplace participants, either as individuals or as a group. Examples of bullying behavior include:

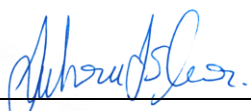

- Manipulation;
- Intimidation;
- Belittling remarks;
- Persistent criticisms, nit picking or fault finding;
- Verbal and/or physical abuse;
- Isolation from colleagues;
- Withholding information; or
- Setting unrealistic targets.

Although bullying may not be specifically in breach of anti-discrimination laws, a workplace participant who bullies a fellow workplace participant may be subject to disciplinary action up to and including dismissal.

10. WHY IS NTSS TRAINING & CONSULTANCY INVOLVED?

Anti-discrimination laws and vilification laws place obligations on NTSS Training & Consultancy to ensure that it prevents:

- Discrimination
- Harassment
- Victimization; and
- Vilification

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Primarily, the person who discriminates, harasses, victimizes or vilifies is liable for their actions. However, NTSS may be held vicariously liable for the actions of its employees unless it has taken “all reasonable steps” to prevent the discrimination, harassment, victimization or vilification.

11. RELEVANT LEGISLATION

NTSS Training & Consultancy and its workplace participants are subject in Turkey, to the following pieces of legislation applying to harassment, discrimination and equal opportunity in the workplace.

- Labour Act 4857 Article 5
- Constitution Article 10
- TCK(Turkish Criminal Law) Act 5237 Article 122

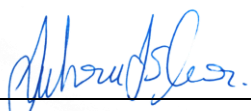

12. COMPLAINT RESOLUTION

The Complaints and Appeals Policy and Procedure (proc no) sets out the procedure to be followed if a workplace participant wants to make a formal or informal complaint of discrimination, harassment, victimization, vilification or bullying.

13. WHAT IS NTSS TRAINING & CONSULTANCY’S POLICY ON CONFIDENTIALITY IN ITS COMPLAINT HANDLING SYSTEM?

A conflict often arises when people want to make complaints but do not want the people about whom they are complaining to know. On the other hand, it is difficult for an employer to take action against an alleged discriminator/harasser unless it can put full details of the complaint to them.

NTSS Training & Consultancy wants to prevent any discrimination, harassment, victimization, vilification or bullying occurring and to stop any discriminatory, harassing, victimizing, vilifying or bullying conduct. It also wants to give workplace participants an opportunity to discuss any issues impartially and confidentially, otherwise workplace participants may not feel free to seek assistance or obtain information.

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NTSS Training & Consultancy also has legal obligations outside anti-discrimination laws to ensure a safe workplace and a safe system of work.

In balancing these competing considerations, NTSS Training & Consultancy will so far as is possible respect a wish for confidentiality. For example, NTSS Training & Consultancy may not take specific action against the alleged discriminator/harasser because the substance of the allegations cannot be established and procedural fairness cannot be afforded. In these types of situations, NTSS Training & Consultancy would only be able to take general preventative action and monitor the situation.

However, there will be times when this may not be possible and due to the nature of the complaint NTSS may be required to act on the information

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