

**ECZACIBAŐI MONROL NÜKLEER ÜRÜNLER SANAYİ VE  
TİCARET ANONİM ŐİRKETİ**

**ECZACIBAŐI GROUP  
GENDER EQUALITY AND EQUAL OPPORTUNITIES POLICY**

**Version 0.1**

**1 September 2023**

## 1. PURPOSE AND SCOPE

The key to success for the Eczacıbaşı Group<sup>1</sup> is channelling “innovative thinking and creativity” towards the right targets, and this is only possible in an environment where diverse ideas can be represented on different platforms, freely discussed, and put into practice. For the Eczacıbaşı Group, “diversity” is “richness”.

A sustainable future is only possible if women can participate in every area of social life as equals. For this reason, gender equality and equal opportunities are considered to be a top sustainability priority. Eczacıbaşı Group companies’ human resources processes are shaped and guided by a perspective grounded on “providing equal opportunities for everyone”; the Group pledges to give all its employees a fair, equitable and safe working life that respects their dignity.

The Eczacıbaşı Group’s gender equality and equal opportunity practices are primarily shaped by the United Nations (“UN”) Universal Declaration of Human Rights, the UN Women's Empowerment Principles (“WEPS”), and relevant decisions of the International Labor Organization (“ILO”).

The Group's sustainability efforts in the field of gender equality and equal opportunities are aligned with the United Nations Sustainable Development Goals, specifically “SDG 5- Gender Equality” and “SDG 8- Decent Work and Economic Growth”.

This Gender Equality and Equal Opportunities Policy (“**Policy**”) has been prepared to regulate the general principles and commitments adopted by the Eczacıbaşı Group on gender equality and equal opportunities and covers all Eczacıbaşı Group companies. This Policy is binding for all activities, executives, and employees of the Eczacıbaşı Group. Group companies shall strive to ensure that the principles set out in this Policy are adopted by, and become common practice among, their suppliers and business partners.

## 2. GENERAL PRINCIPLES AND COMMITMENTS

Eczacıbaşı Group companies believe that diversity is an essential component of their corporate culture and, as responsible employers, are committed to offering all employees equal opportunities and impartial treatment. Accordingly, Group companies shall take all necessary measures to ensure equity, diversity and inclusion in their activities and use a variety of mechanisms, such as employee engagement surveys and equal opportunity targets, to monitor and improve their performance in this area.

In line with the above, every Eczacıbaşı Group company shall:

- Not tolerate, under any circumstances, any kind of discriminatory attitude, behaviour or practices against an individual based on race, colour, language, gender, sexual orientation, marital status, age, religion, philosophical or political opinion, physical qualities or any other visible or invisible attribute.

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<sup>1</sup> The “Eczacıbaşı Group” or the “Group” refers to Eczacıbaşı Holding Co. and all of the companies in which Eczacıbaşı Holding Co. directly or indirectly owns 50% or more of the share capital or has direct or indirect management control.

- Consider equal treatment and equal opportunities for all employees and candidates a fundamental right and support flexible working conditions for employees with different needs.
- Offer every employee equal opportunity in all human resources processes, including performance measurement and evaluation, career planning, performance rewarding and promotion, training-development programs, and dismissal.
- Evaluate the suitability of candidates' qualifications for a position when making decisions on recruitment and promotion, monitor the share of women employees in every step of the process, and when necessary, plan activities aimed at increasing the share of women employees.
- Remunerate all employees doing the same work at the rates set out in the relevant policy (Remuneration Policy). Personal attributes that could lead to gender-based or other forms of discrimination are not considered in determining the initial wage or wage increase for an employee. Remuneration is based on a comprehensive evaluation of the employee, the characteristics of the position, and other objective criteria. Companies shall continually monitor pay data and take corrective measures in the event of a gender gap.
- Ensure balanced gender representation in their governance bodies. They shall offer women every opportunity to have decision-making executive roles at senior levels of their management structure and facilitate this process with development and support programs.
- Implement measures that prevent the use of discriminatory or sexist elements in corporate policy and operational procedural documents, internal and external communication materials, printed and visual media advertisements, advertising and promotional campaign themes and texts, and visual design content. The Eczacıbaşı Group is one of the first members of Unstereotype Alliance Turkey, a platform that aims to transform harmful gender stereotypes in advertising.
- Pay utmost attention to using egalitarian and inclusive language in all communication. Group companies shall work to increase the awareness of executives and employees in this regard.
- Offer various fringe benefits like daycare support and paid paternity leave to help women and men share responsibilities in their private lives and thus contribute to sustainable development.
- Provide a healthy, peaceful, and safe working environment free from all kinds of mobbing, violence, harassment, pressure, and threats. The mechanisms to be applied in the case of violations are predefined and published in the Eczacıbaşı Group Code of Conduct. Employees involved in any of the above misconduct are treated with zero tolerance and are subject to in-house disciplinary and legal procedures if necessary.
- Work to create opportunities for increasing the employment of women both in value chains and society-at-large, prevent gender-based violence and acts of hatred, and facilitate women's access to education and employment.

- Develop collaborative projects with non-governmental and international organizations active in gender equality.
- Set concrete targets for gender equality and equal opportunities practices and performance and periodically monitor outcomes using objective indicators.
- Monitor and prioritize the implementation of certification processes that help to improve occupational health and safety processes.
- Collaborate with external stakeholders to improve their OHS performance.
- Conduct internal control and external audits to improve OHS processes.
- Embrace behaviour-oriented occupational health and safety management.
- Set, monitor, and analyse key performance indicators (KPIs).
- Ensure that all workers, contractors, visitors, and apprentices increase their awareness of occupational health and safety through briefings and training.
- Consider and manage OHS risks when planning new investments or changes to existing investments.
- Develop, create, and implement action plans and effective communication for possible emergencies and risks and periodically review their efficiency.
- Monitor suppliers' and contractors' compliance with the principles set out in this Policy.

### **3. IMPLEMENTATION RESPONSIBILITY**

This Policy was drawn up by the Eczacıbaşı Group Gender Equality Committee and Eczacıbaşı Holding Sustainability, Corporate and Government Affairs and entered into force with the approval of Eczacıbaşı Holding Board of Directors following a favorable assessment by the Eczacıbaşı Holding ESG (Environmental, Social, Governance) Committee.

Overseeing the implementation of the clauses set out in this Policy is the responsibility of the senior management of Group companies. Group companies' business units shall assume responsibility for implementation in their respective areas of responsibility. Monitoring of Policy implementation in Group companies shall be carried out by the Eczacıbaşı Holding ESG Committee and Group companies' Internal Control and Compliance Teams.

### **4. POLICY REVIEW**

This Policy shall be reviewed and assessed on an annual basis by the Eczacıbaşı Group Gender Equality Committee. If there is a significant change in the organization's practices that is likely to affect the Policy, the Policy shall be reviewed and adjusted by the Eczacıbaşı Group Gender Equality Committee and Sustainability, Corporate and Government Affairs when necessary. The changes made in the Policy will enter into force following the approval of the Board of Directors.

## **5. SUGGESTION AND COMPLAINTS**

Requests for information, suggestions and complaints regarding the Policy can be shared anonymously through the VCO (*Virtual Compliance Officer*) notification channel (<https://eczacibasi.vco.ey.com/>) or sent to [uyum@eczacibasi.com.tr](mailto:uyum@eczacibasi.com.tr) via e-mail. The Eczacıbaşı Group Code of Conduct Manual states the actions to be taken in cases of behaviours and practices that violate this policy.

Employees or other stakeholders who make notifications and complaints in good faith regarding behaviours violating the norms of this Policy shall not be exposed to retaliatory behaviour and attitudes.