

HARASSMENT PREVENTION POLICY

1. PURPOSE

The purpose of this policy is to establish principles and regulations to create a work environment free from sexual harassment and sexual assault. Through this policy, the Company aims to raise awareness about harassment, sexual harassment, and sexual assault within its organization, and is committed to implementing an effective investigation and disciplinary mechanism to prevent such incidents. The Company pledges to educate employees about harassment, sexual harassment, and sexual assault, to support victims, to initiate efforts towards restorative justice (subject to the approval of the affected parties), and to address all claims and complaints related to such incidents.

2. SCOPE

The provisions set forth in this document apply to the Company and all its subcontractors. These regulations are applicable in all situations where employees are gathered, regardless of time or location. Through this policy, the Company is committed to assessing all allegations of harassment, sexual harassment, and sexual assault, and to implementing appropriate administrative measures to ensure the effective conduct of investigations and to safeguard the complainant.

3. DEFINITIONS

Harassment: Any actions taken to threaten, intimidate, or coerce an employee, a colleague, or anyone else working with the Company.

Verbal Harassment: Offensive and unwelcome comments made about a person's personal characteristics.

Nonverbal Harassment: Mocking, denigrating, or humiliating a person; displaying, sharing, distributing, or threatening the person with any verbal, written, or visual material that may provoke hostility, avoidance, or a lack of respect.

Sexual Harassment: Unwanted behaviors directed by one person towards another with the intent to obtain sexual favors, including verbal sexual advances or demands that are not welcomed by the recipient. Such behaviors may influence decisions regarding employment or create an intimidating, hostile, and humiliating work environment.

Types of Sexual Harassment: Within the scope of this policy, sexual harassment behaviors are categorized into two types:

- i. **Verbal Sexual Harassment:** Sexual insinuations, obscene comments, sexual jokes, inappropriate proposals, sexual threats, sexual offers and requests, and repeated unwelcome advances.
- ii. **Nonverbal Sexual Harassment:** Sharing visual or written material containing sexual content or insinuations, making sexually suggestive noises or gestures, whistling at someone, giving malicious looks, and making disturbing sexual gestures or facial expressions.

Sexual Assault: The act of violating a person's bodily autonomy through sexual behavior.

4. ASSIGNEES

Each employee and manager of Smart Güneş Teknolojileri and its affiliates is required to adhere to this Policy and to support and participate in the implementation of the appropriate procedures

and audits within the framework of the rules established by this Policy. Smart Güneş Teknolojileri and its affiliates also expect their Business Partners to comply with this Policy and to act in accordance with its provisions, taking the necessary measures to uphold these standards.

5. RESTORATIVE JUSTICE

Restorative justice aims to fully understand the needs of the victim and seeks to find solutions by involving not only the victim and their support network but also the alleged harasser and their support network in the process. Such solutions may be proposed to the complainant by the Company based on the specifics of the situation. However, these solutions are intended as internal remedies that do not affect the statute of limitations on disciplinary or criminal investigations or other legal remedies, nor do they serve as an alternative or prerequisite for pursuing such remedies. Restorative justice should not be confused with mediation or conciliation.

5.1 PRINCIPLES

5.1.1 Principle of Confidentiality

The Company will adhere to the principle of confidentiality regarding the private lives of both the complainant and the accused throughout all stages of addressing allegations of harassment, sexual harassment, and sexual assault. Maintaining confidentiality is crucial to protect the personal details of the individuals involved from being disclosed during the resolution process of sexual harassment allegations.

5.1.2 Principle of Due Diligence

In handling allegations of harassment, sexual harassment, and sexual assault, the Company is committed to avoiding any actions that could lead to the re-victimization of the complainant or damage the dignity of any party involved. This principle ensures that the complainant is not further victimized, particularly during the investigation and resolution process related to such allegations.

5.1.3 Principle of Trust

The Company will adhere to the principles of confidentiality and due diligence and will act in a manner that upholds the trust of all parties involved.

5.2 Declaration and Evidence

Harassment, sexual harassment, and sexual assault is a phenomenon that often occurs between two people and is difficult to prove. Because of this, it pushes the harassed to remain silent and therefore creates an environment suitable for harassment. The prevention mechanisms introduced by this document will operate on the principle of understanding the nature of the incident through a more holistic reasoning regarding the nature of the harassment, the context of the incident and the individuals, even in the absence of clear evidence. However, since the suspicion that may arise due to insufficient evidence in administrative and judicial investigation processes is interpreted in favor of the defendant, it is important for people who have been harassed to be sensitive about collecting and storing different types of materials that can be used as evidence in the investigation, provided that they comply with the law.

5.2.1 Intentional Misrepresentations

Disciplinary sanctions will be imposed in cases where it is conclusively determined that the complainant has intentionally provided false information or made false statements during the

investigation process following their report. This policy cautions against engaging in emotional or personal confrontations within the Company regarding allegations of harassment, sexual harassment, or sexual assault.

Through this Policy, the Company affirms its commitment to raising awareness about harassment, sexual harassment, and sexual assault, and to implementing preventive measures as outlined in the objectives, principles, and recommendations specified above. The Company also pledges to operate an effective investigation and disciplinary mechanism to address any allegations and complaints of such incidents.

6. IMPLEMENTATION

The Ethics Committee is responsible for handling complaints and providing training related to the prevention of harassment, sexual harassment, and sexual assault within the Company.

As part of efforts to combat harassment, sexual harassment, and sexual assault, all personnel receive informational training on this Policy. Upon completion of the training, a survey is administered to assess understanding of the material. The results of the survey are reviewed by the Company Representative designated by the Ethics Committee, and appropriate actions are taken based on these evaluations.

Following the provision of training on the prevention of harassment, sexual harassment, and sexual assault, as well as information about this Policy, brochures are distributed to employees. These brochures include contact information for reporting instances of harassment, sexual harassment, and sexual assault. Additionally, Harassment Complaint Forms, which are attached to this Policy, are made available in designated complaint boxes. During the training sessions, all contact information is clearly communicated to personnel.

Additionally, informational posters related to harassment prevention will be displayed in the workplace to enhance staff awareness on this matter.

If you become aware of any actions that you believe violate this Policy, applicable legislation, or the Smart Güneş Teknolojileri Code of Ethics, you should report such concerns through the Company's designated ethical channels outlined below:

Web: etik@smartsolar.com.tr and sikayet@smartsolar.com.tr

Ethical Line telephone number: +90 216 225
7282

Internal Ethical Line telephone number: 7282