

ETHICAL CODE OF  
CONDUCT AND  
ETHICAL COMMITTEE  
WORKING PRINCIPLES

## 1.0 PURPOSE

The purpose of this study is to define the principles of Ethical Code of Conduct and the bases of Ethical Committee Process and Working principles, for all employees and managers to comply with in Anel Holding as well as in all group companies, as long as the employment continues.

## 2.0 CONTENTS

It covers all managers and staff that are employed based on a continuous, temporary or part-time service contract.

## 3.0 CONCEPTS AND DEFINITIONS

**3.1 Values:** The values are the essential principles owned by people and guide them when they are making a decision. The values that people own are reflected to the world in form of behaviors. Corporate values are reflected in the corporate culture.

**3.2 Morals and Ethics Concepts:** Ethics in its simplest definition is a moral philosophy. It judges the norms that define good and bad, pointed by morality. Ethics uses the norms that moral pointed out but thinks long about these norms and try to define the good in a more general way.

**3.3 Personal Data:** Any kind of information relating to an identified or identifiable person

## 4.0 OUR VALUES

We work to add value to the World, the society that we live in and to the organizations and institutions that we work with. We look after the values that constitute our corporate culture and that are foundation to our success. We work with people who comply with our values.

**4.1 Solidarity:** We determine the target and the path that leads to target together. We are aware that we need to share the information with all our partners for right management. We care about listening to each other. We try to see the perspective of others and we care about listening and explaining. We spare some time to aid to our teammates. We build relationships based on mutual trust and in nondiscriminatory way. We encourage our friends to be more successful and to be more participant and express their ideas. We believe that they have all right to information.

**4.2 Tenacity:** We believe that the high performance and the ability to perform multiple important tasks at the same time are based on the sense of responsibility. We always deliver high and consistent performance. We aim to become a star in our own field, as a member of the team. When every member of the team becomes a star, that's the way to achieve the perfection. We give accurate commitments and we fulfill our commitments. We'd say what's hard to say, we make tough decisions.

**4.3 Rationalism:** We determine the origins of the problems and we improve the processes strategically so that the same problem never occurs again. We differentiate what needs to be solved immediately and what needs to be improved later in a rational way; and we make our plans accordingly. We avoid redundant expenditure; we challenge all expenditure that we

made. We aim efficiency in our return on investment. We question the incompatible behaviors with our values. We accept our faults.

**4.4 Improvement:** We take into consideration different approaches and suggestions. We embrace innovative and creative behaviors from our stakeholders when we define our strategy; we improve our services and processes accordingly. We always aim to achieve greater success. We learn in ambitious and quick way. We try to understand our strategy, our market, our customers and our business partners better. We are also interested in the other fields as well as our own area of expertise. We try to improve ourselves. We consider the events from different angles so that we can find practical solutions to difficult problems. We challenge the information and we suggest new approaches. We create ideas that create value. We try to simplify our processes. We believe that the quality needs to be improved continuously; we try to achieve greater success.

**4.5 Respect:** We respect people. We take into consideration in our behaviors and in our every communication what opposite side might think. We share our ideas freely with our colleagues and we communicate in a respectful manner. We create safe and healthy work environment. We respect nature. We respect the right to live of every living creature. We are sensible. We develop economically sustainable social responsibility projects and make them real, to create a better world.

## **5.0 ETHICAL CODE OF CONDUCT**

The base of ethical code of conduct in Anel is the corporate values that form corporate culture, in addition to generally accepted ethical values.

Anel works with the zero-tolerance policy in case of violation of ethical behavior or values constituting corporate culture. Anel employees should avoid actions that may be interpreted as such, even if there is no violation.

### **5.1 Respect**

- The use of delicate and respectful language is encouraged when communicating with customers, partners and suppliers as these communications reflect Anel's identity.
- Anel employees respect the privacy, private life, personal preferences, and the cultural and religious differences of their colleagues. They would never use this information for abuse or they wouldn't discriminate due to favoritism.
- The managers cannot give any work to employees that is not related to their job itself.
- We tolerate the ideas and beliefs of the individuals about religion and private life.
- We respect the national and religious values of our employees who are citizens of other countries.
- The records of employees are kept confidential by relevant authorities.
- We respect the privacy of the activities of our employees outside work.
- We don't get involved to immoral conversations / communications between our colleagues and/or our customers.
- It is not allowed to put someone under physiological pressure and/or to mob verbally and/or physically.

### 5.2 Compliance with Laws and Regulations

- Anel acts in lawful, professional and ethical way when conducting commercial activities and appreciates transparency and reliability in management and administrative practices so that Anel ensures that every employee of the company always acts in compliance with the laws.
- Anel employees are obliged to act in compliance with laws and regulations when conducting their business.
- While performing their duties and responsibilities Anel employees are obliged to comply with all regulations and announcements, company working principles that have been published on intranet and/or communicated by e-mail.

### 5.3 Privacy of Company Information

- As Anel employee, you have access to information about Anel and its partners, to a certain extent according to your position in the company. This kind of information including salary and salary policies is called as “Company Information”. You should pay attention to the privacy of Company Information with your internal and external contacts in your private or professional life. Your obligation about this information is to keep it confidential. Our actions and our negligence may damage the reputation and interests of Anel and its customers. It is important to be aware of this and act with integrity both in and outside of work environment.
- Anel employees are responsible for keeping Company Information confidential and for not distributing the information mentioned without permission. We are applying “Clean Desk Policy” therefore the Company Information which is not yet declared to public, shouldn’t be easily accessible to anybody except Anel’s employees and/or Anel’s partner(s) who are aware of this information.
- The materials like CD-ROM, USB, files, documents or other data carrier device which contain confidential and company information, are required to be maintained locked after the information is used and especially at the end of every working day.
- The passwords used in the systems, should not be written somewhere that can be seen by anybody like on desktop or on the top of the screen. You are expected to setup your computer to require a login password automatically when the computer is not used for a certain amount of time. Documents containing confidential information should not be shared in public networks, waste papers containing confidential information needs to be destroyed. Anel employees are responsible for the safety of all documents, which can be, classified as confidential information in their PC, USB or external drive or other devices to store data. If the confidential/important data needs to be stored in USB or external drive, the data must be encrypted.
- The company records and documents cannot be obtained, changed or destroyed without authorization.

### 5.4 Protection of Personal Data

- In accordance with General Data Protection Regulation and related legal regulations; processing, copying, storing, transferring and distributing personal data is forbidden for employees who have Access to personal data of her/his colleagues or third party information, except for as a matter of course. The obligation of employees is to use the personal data only within the limits allowed by their job descriptions and only as a matter of course, and to keep it confidential in other cases. Employees must be aware of this

issue and act in accordance with the policies, procedures and legal regulations, since actions that are incompliant with regulations would be illegal and would harm Anel and third parties.

- Files, documents, USB drives, external drives and all other data carrier devices that contains personal data have to be used only internally, and in any case, they have to be kept locked after using, especially after working hours.
- Anel employees are responsible for securing all kinds of documents that contains personal data in all kinds of devices that data storage is possible, such as computers, flash disks, external disks, servers, cloud, e-mail and such.

#### 5.5 Sharing Accurate Information & Accurate Reporting

- It is not authorized to share false, misleading or inaccurate information for company or company employees in internal or external communications.
- Employee should report to Human Resources department every change in his/her personal, family, marital and address details as well as the information about the personal and family relatives, which are subject to regulations and rights, defined by contracts and/or regulations.
- It is very important to keep accurate and complete records, reporting them and presenting them for Anel to be a reliable organization. Therefore, it is strictly prohibited to keep false, incomplete and/or misleading records, accounting documents, statements, tax returns and reporting. It is your responsibility to apply this principle to your daily work.

#### 5.6 Sharing Information with Press and Social Media

- Press communication is an important tool for corporate reputation management. If any demand of communication is directed to you from press members about Anel and its activities, you should pass over silently and you should immediately inform the spokesman of your department and Corporate Communications Department.
- Company senior management should authorize the employee to give an interview to any media organization, do interviews and participate to a seminar/conference as a speaker. It is forbidden to gain profit from these activities.
- Anel employees should avoid sharing in their personal social media accounts or Anel's social media accounts any sensitive opinions like political, religious, etc. issues that may be linked to Anel or may be perceived as Anel's corporate opinion and that may expose the private company information of the employers, institutions that we cooperate with and Anel's itself.

#### 5.7 Usage of Anel's Resources

- It is not allowed to use Anel's assets, facilities and staff other than Anel's interest.
- The resources should be used economically.
- Employees use their time well; they don't allocate any time to personal business during working hours.
- Managers shall not ask employees to complete their personal tasks.
- It is essential not to have personal visitors during working hours. It is encouraged to allocate a reasonable time for compulsory meetings depending on the subject of the meeting so that the employee can complete their daily assignments.

- To protect privacy of company information, it is contrary to company procedures to have a meeting with a relative of an employee and to accept them into the production area.
- The business negotiations should be carried out in appropriate meeting rooms.
- The time and effort should be allocated for the company only, it is forbidden to undertake any other responsibility or work under the presence of a real or legal person.
- Employees can work voluntarily for charitable foundations. It is expected for them to work after business hours if they work for any foundations other than Çelikel Education Foundation.
- It is perceived as inappropriate usage of company resources and it should be avoided to access inappropriate websites from company computers, to use harassing messages, images or e-mails from company mobile phones.
- The company assets and the belongings of employees and visitors at the workplace should not be misused and should not be damaged.

#### 5.8 Avoidance from Conflicts of Interest

- It is not appropriate for Anel employees to ask for any personal gain as any gift, money, check, property, holiday or special discount or accept any kind of gift from the persons or institutions that Anel is conducting business with. Although, it is acceptable to receive gifts as promotional items with company corporate logo or giveaway (calendar, pen, etc.) of the persons and institutions that we are conducting business with, as these types of gifts would not lead to a negative perception.
- Engaging in commercial relations of the Anel employee's relatives until 3<sup>rd</sup> degree with Anel's competitors, suppliers or partners may lead to a conflict of interest.
- When employees establish commercial relationships, get into debt/credit relationships in any way and therefore create a relationship based on self-interest with their managers, colleagues and other employees, these behaviors will be deemed conflict of interest. For this reason, such relationships and behaviors among employees are not considered appropriate by Anel.
- It is forbidden to engage in a personal financial relationship with a customer, supplier or business partner, to gain personal interest by using business relationships.
- It is encouraged to continue a distant and impartial relationship with customer, business partner and supplier in line with honesty and transparency principles.
- All employees are obliged to report to Ethics Committee if they observe any conflict of interest.

#### 5.9 Bribery and Corruption

- Anel prohibits bribery when doing business. You are requested to strictly comply with anti-corruption law and regulations. Being applicable to all fields of activities in which Anel Group companies have been involved, any facilitating action for the company or any tangible and/or real contribution to political parties or politicians are forbidden. Our Company's Execution Board supports implementation of this ethical rules against bribery.
- If you receive any bribe offer from someone, you must immediately report this situation to your manager.
- Anel only permits to give corporate business gifts prepared by Corporate Communications Department. You may get additional information from your manager

and Corporate Communications Department; and in case there is no gift ready to give away, you may jointly produce a gift idea specific to the context.

- This anti-bribery and anti-corruption rules are applicable to and binding for all of our “Business Partners” including but not limited to our company agents, consultants, distributors, suppliers and any joint venture partners, working for or on behalf of our company worldwide.

#### **5.10 Justice and Reliability**

- The professional and thorough approach to business process from the beginning to the end strengthens the perception to this phrase: “Whatever Anel does, Anel does it correctly”. The base of the relationship with employees and stakeholders is constituted by confidence and reliability principles.
- During recruitment process, we not only pay attention to main qualities for the functions but also to additional qualities like creativity, reliability, sensitivity, integrity and competence to work in team. It is important that best candidates have the chance to apply freely for open positions without any discrimination about age, gender, sexual orientation, marital status, disability, skin color, racial or ethnic origin and nationality. Besides, Anel applies positive discrimination policy for women in recruitment process.
- Anel takes special measures and makes changes to ensure that its employees become equal with other employees without discrimination due to their handicaps. Anel does not recognize special measures and changes as discrimination against other employees.
- Managers don’t discriminate against direct reports and other colleagues. All employees are entitled to same self-development opportunities.
- A transaction should not be completed without customer’s consent, even if the transaction is in favor of the customer. It is not allowed to benefit from customer’s weakness or failures even if it would be beneficial for the company, or to gain profit by giving incomplete or incorrect information to a customer.
- The same justice and reliability principle should be applied when selecting the business partners and continuing business relationships. When serving a customer, the activities should be compliant with human rights. It is also applicable for 3<sup>rd</sup> parties hired by Anel. If there is a doubt about the work carried out by 3<sup>rd</sup> parties to be compliant with law and Anel’s Ethical Code of Conduct, this should be discussed with department manager to evaluate. If the customer is an existing customer, the termination of the business relationship according to management’s approval is an alternative.

#### **5.11 Customer and Family Transactions**

- Anel employees need to work freely from personal business and private interests with customers and/or family members/acquaintances and should be able to act objectively without any prejudice. In line with this direction, it is not considered as appropriate to work together with 1<sup>st</sup> degree relatives within Anel.

#### **5.12 Occupational Health and Safety**

- Anel invests to create a healthy and safe working environment for the employees, to reduce the accidents. Employees are encouraged to pay attention to other people’s health and safety that may be affected by them.

## 6.0 ETHICAL COMMITTEE PROCESS AND WORKING PRINCIPLES

Anel accepts that the real responsibility to detect and prevent unethical and/or unlawful behavior lies on the shoulder of all employees from every level. Anel provides a mechanism for employees to report freely unethical behaviors that they observe and encourages that the employees to report that kind of behaviors.

### 6.1 The purpose of this policy

- To give a “voice” to employees about ethical issues
- To develop an environment where all employees at all levels feel safe and free to share their real and reasonable concerns about ethical behaviors and management.
- To ensure how Anel will correctly respond to any reported intrigue situation, misconduct or unethical behavior.

### 6.2 Behavior Types to Report

Anel employees should report the suspicious actions and/or incidents with these main headings:

Generally speaking;

- Unlawful behavior and practices
- Violation of Anel’s policies, procedures, ethical code of conduct and regulations

Particularly;

- Situations that create conflict of interest,
- Corruption (bribery)
- Theft, fraud or embezzlement (abuse of confidence)
- Significant mismanagement or abuse of money or resources
- Abuse of authority
- Serious damage to public health, safety or environment or to health or safety of any Anel employee
- Violation of published Policies and Procedures for Protection of Personal Data
- In case of any breach about information security (Information Security Case Management Procedure will be applied)
- In case of any action to be taken against any employee and damage the employee because he/she has reported something based on this policy.
- Mobbing, use of physical violence, physical harassment and/or sexual harassment(\*) or these kind of disturbing behaviors to any Anel employee or a 3<sup>rd</sup> party. (\*) The details are specified in Appendix 1.
- Showing indifference, negligence, and disorganization in the performance of duty,
- Not complying with the Occupational Health, Safety and Environment instructions and relevant legislation,
- To keep, delay, and not do what is necessary for the complaints, notices, and applications sent to him about the company,
- To give articles, statements, and information about Anel's general policies to the media and those who may be associated with them, without the permission of the Management,
- Fighting at work for whatever reason, causing a fight, being dishonorable to co-workers,
- Not informing the relevant parties immediately despite knowing about a corruption or irregular transaction within Anel,
- Using drugs or alcohol in the workplace, or coming to duty with alcohol or drugs,

- Making misleading, untrue statements in inspections and investigations, avoiding giving statements without justification, complicating the investigation, or obscuring or destroying documents,
- Doing business, establishing secret or open partnerships with suppliers or customers,
- Intentionally making the company pay for personal expenses.

### 6.3 Ethical Committee Distribution of Tasks

Chairman of Ethical Committee: Anel Holding Executive Board Vice President

Secretary of Ethical Committee: Internal Audit Manager, Quality Management Systems Specialist, Corporate Lawyer

Ethical Committee Members: Executive Board members, Group General Managers, Anel Holding Human Resources Director, Chief Financial Officer, Board of Directors

Internal Audit Board: Internal Audit Manager, Quality Management Systems Officer, Corporate Lawyer

Chairman of Ethical Committee has right to appoint a member from Ethical Committee to take action on his/her behalf and to make decisions.

### 6.4 Ethical Committee Working Principles

All employees of Anel at all level should report any ethical behavior on any subject that they detect and/or observe.

### 6.5 Reporting Process

Anel employees should report the incidents to the Secretary of Ethical Committee (Quality Management Systems Specialist or Legal Department) or Human Resources Directorate.

### 6.6 Reporting

- With written petition
- With e-mail ([etik@anel.com.tr](mailto:etik@anel.com.tr))
- As verbal notice to be written in official report

### 6.7 Evaluation Process of Reported Incident

- The Ethics Committee Secretary shall communicate the incident, which are communicated to him/her verbally or in writing, to the Ethics Committee.
- Quality Management Systems Specialist is appointed as investigator by Ethical Committee to investigate any incident reported by any employee.
- Department managers that are related to the complaint could be included in the investigation process.
- During the investigation process, all evidence about the incident are collected.
- The person who made the complaint will be questioned for additional information.
- A written defense is requested from the complainee.
- Top senior management may be asked to give opinions functionally and administratively if required by Ethical Committee, by taking into consideration the scope of the incident.
- After the collection of all documents, opinions and evidence, Ethical Committee gives its opinions.
- The Secretary of Ethical Committee keeps the details of the incident, the evidence, and the documents with special review report and archives the report. These records should be retained for 10 years.

- Ethical Committee will meet up with the participation of related members and under the presidency of Vice Chairman of the Board. The participation of at least 3 members is required.
- Each member has an equal vote. Decisions are taken by majority of votes. The person who doesn't agree with the opinion states his/her opinion with his/her reasons and Secretary of Ethical Committee records these opinions in writing.
- Secretary of Ethical Committee who leads the investigation has no right to vote.
- In addition, if any Ethical Committee member is a part/parts of the incident/complaint, he/she cannot participate in assessment process and in the voting.

### **6.8 Sanctions**

If a violation has been determined by Ethical Committee's evaluation, following sanctions may be applied to employee(s) according to the Committee's decision:

- Written warning
- Written condemnation
- Termination of employment with the valid reason  
Immediate and just cause termination of the employment contract

### **6.9 Confidentiality**

The identity of the employee whose declaration has been requested by Ethical Committee is kept confidential. However, when the incidents may lead to legal actions, the identity of the employee will be shared with legal authorities according to legal obligations.

The confidentiality needs to be bilateral. As Ethical Committee should keep confidential the identity of the employee that made a declaration, the employee should not give anybody any details about the incident (related people, places, time, nature of the incident, etc.) If the employee exposes this information, disciplinary sanctions may be applied.

Upon the approval of the Ethics Committee, the managers and/or employees of the relevant units, whose information and experience are consulted during the investigation, cannot take any action or action to delay, influence or prevent the investigation of the Ethics Committee, and they have to submit all kinds of information and documents to support and assist the investigation being carried out. Employees whose knowledge/wisdom is consulted during the investigation shall submit the requested information and documents within 05 (five) business days from the date of the request. In cases where 05 (five) business days are insufficient, additional time will be requested by explaining the situation in writing. Otherwise, disciplinary sanctions in article 6.8 could be applied to the relevant managers and employees.

### **6.10 Status of the Employee Reporting Unethical Incident**

Employers or colleagues may not apply following negative treatments to the employee who declared an unethical behavior:

- Termination of employment contract by the employer
- Degradation in organization
- All forms of harassment (mobbing)
- Discrimination

If the employee or his/her family believes that the employee is victim of above-mentioned situations, they need to immediately report their concerns to Ethical Committee.

If it is found out that any manager has fired, degraded, verbally and/or physically harassed or discriminated any person because the person has declared an unethical behavior or incident, disciplinary sanctions including short-term suspension may be applied to this manager. If his/her colleagues expose him to above-mentioned negative treatments, disciplinary sanctions may be applied to relevant staff.

#### **6.11 If the Employee has made in bad faith unreal declaration about unethical behavior or Incident**

As a result of investigation, if it is found out that the person who declared the unethical behavior acted in bad faith and that the incident is false after evaluating the evidence, the sanctions may be applied to that employee according to Labor law.

Anel Group employee who declared unethical behavior or incident may request from Ethical Committee a relocation or not come to work as authorized or any other alternative facilities. The Ethical Committee will evaluate these requests in good faith and put into practice within the agreed time period.

Anel's aim is to be recognized as "an ethical workplace" and to strengthen its reputation by fulfilling its management obligations seriously.

**APPENDIX-1****PRECAUTION AND SUPPORT PRINCIPLES AGAINST SEXUAL HARASSMENT****PURPOSE**

Our culture depends on mutual respect and cooperation principles. Sexual harassment is a material violation to these principles.

Our goal in setting out these principles is to regulate the working essentials of prevention, support and empowerment, investigation and sanction mechanisms necessary for the creation of a working environment completely free from gender-based harassment, sexual harassment and sexual assault.

**SCOPE**

It applies to each person regardless of gender, sexual orientation, level, seniority, status and other protected characteristics.

It covers employees, subcontractor representatives and employees, all persons and employees of companies provide services, customers and those who interact with our company without any limits on time and place.

**GENERAL DEFINITION OF HARASSMENT**

All forms of visual, verbal, or physical acts towards raciality, ethnicity, religion, sexual orientation, gender and personal characteristics, including deprivation of persons, with or without use of force, are defined as harassment. The factor that determines harassment is not the intent, but the effect it has on the other person.

Harassment is also covers the disturbance of a person of efficiency, dignity and honour by a part of the work colleagues. This type of harassment is seen through examples such as isolating the person within the organization, not including the person projects and studies, preventing the person from using communication and other personal rights.

Sexual harassment is the most difficult to describe among behaviours including harassment. There are many types of sexual harassment that are explicit or covered; although it is generally seen in the relationships between superior-subordinate relations or the between men and women, it can also be found among peers and fellows.

**WHAT ARE SEXUAL HARASSMENT AND ASSAULT?**

Unsettling words, attitudes and behaviours that are non-consensual and with sexual content. Sexual harassment may lead to reactions such as confusion, shock, inability to understand on the person exposed. Therefore, even if the person who thinks that he/she is subjected to sexual harassment or assault is not sure of the nature of the incident, raising the issue to the unit or person to guide him/her shall be the first step.

The following examples are, without limitation the types of sexual harassment.

**Social Gender-Based Harassment;** Although it does not include explicit sexual words or behaviours, it is a form of harassment that has a negative effect on the person, which is directed due to the gender, sexual orientation or gender identity of the person by consolidating social gender roles.

- Making embarrassing, derogatory and/or insulting comments on the person's true or perceived gender, gender identity, sexual orientation, appearance or private life (marital status, etc.),
- Threatening the person for exposing his or her sexual orientation or gender identity,
- Knowingly use a person's name, gender identity or the pronoun he/she expresses himself/herself, or making constant references to his/her gender identity background,
- Making discriminatory treatments to the person due to his/her real or perceived gender, gender identity, sexual orientation, appearance or private life (marital status, etc.),
- Externalising, alienating, isolating the person due to his/her real or perceived gender, gender identity, sexual orientation, appearance or private life (marital status, etc.),

**Sexual Harassment:** Words, attitudes and other behaviours of a sexual nature that are non-consensual and without physical contact. Depending on the environment and context of the incident, persistently repeated actions or a single action may be considered as sexual harassment. Such word, attitude or other behaviour does not have to be continuous. However, the continuity of the harassment aggravates the nature of harassment.

- Making a comment, making a sexually explicit joke or compliment or using slang words,
- Engaging in persistent actions beyond the usual for flirting,
- Disturbing with pornographic material, sending or showing them,
- Forcing a person for intimacy or sexual intercourse by threatening the person by using his/her video, audio etc. records without consent;
- Recording and disseminating a person's sexual behaviours without consent;
- Asking questions or spreading rumours about a person's sexual life,
- Making sexual actions arising with threats, blackmailing or insults and similar acts,
- Actual stalking,
- Disturbing with undesirable glares and facial expressions,
- Disturbing by sending messages or requests, or implying such requests, using telephone, e-mail or similar means of communication or social networks,
- Insisting for sexual intercourse.

**Sexual Assault:** Violation of a person's physical immunity without having to maintain continuity with sexual behaviours that are not based on one's consent.

**Persistent Stalking:** All sexual attitudes and behaviours that cause physical or psychological fear and/or a feeling of desperation in a person, in a way causing the person to be concerned about his/her safety upon usage of actual, verbal, written or by using any means of communication. Persistent stalking is a form of sexual harassment and requires the activation of emergency measures.

**Rewarding Promise:** Promising privileges such as reward, promotion or raise or reducing workload or shortening of work time in the event of acceptance of a person's behaviour or offers for sexual or emotional purposes. Explicitly indicating or implying that the person shall obtain undeserved gains if he/she accepts the sexual behaviour or offer is a rewarding promise. Rewarding promise is a form of sexual harassment and requires the activation of emergency measures.

**Retaliation:** Making a person's business life difficult for revenge purposes in the event the person rejects the sexual or emotional behaviour or offer, or wants to raise the issue in the event he/she is exposed to sexual harassment or sexual assault or wants to report or reports on social gender-based harassment, sexual harassment or assaulting incidents a person has witnessed. Retaliation and threat of retaliation requires the activation of emergency measures. Preventing a person's promotion, ignoring, rejecting his/her professional development, rejecting professional meeting demands, spreading rumours that may cause negative impacts, making difficult the use of personal rights (such as annual leave, overtime fees, etc.), and forcing a person to do jobs that are not included in his/her job definition are considered retaliation.

#### **WHAT ARE THE PRECAUTIONS/STEPS TO TAKE IN THE EVENT THE PERSON THINKS HE/SHE IS EXPOSED TO SEXUAL HARASSMENT/ASSAULT?**

First of all, the person facing such a situation should know that he/she is not alone and desperate and that the company stands beside such person.

- Avoiding situations and persons who may be open to sexual harassment and assault.
- Clearly warning that behaviour is unsettling, and clearly saying "no" on undesired sexual approaches.
- Contacting the Ethics Committee Secretariat to obtain support and learning his/her rights. ([etik@anel.com.tr](mailto:etik@anel.com.tr))
- Informing the person who has disturbing behaviours and approaches that he/she shall take official initiatives if he/she does not give up his/her actions.
- Collecting and storing any material (e-mail, note, any document, phone message, etc.) that can be used as evidence from the very first moment.

#### **WHAT SHOULD BE CONSIDERED TO EVALUATE A BEHAVIOUR OR AN ATTITUDE AS HARASSMENT?**

- Knowing no means "no".
- Apologising once noticing that the behaviour is not appropriate or once it is mentioned, not to ignore or underestimate the disturbance.
- Being sensitive to the wishes, consents, attitudes and verbal expressions of others, and not to make any initiatives on sexual approaches without being sure that the counter party has consent.

#### ETHICAL COMMITTEE EVALUATION PROCESS

The Ethics Committee Secretariat acts in a quick manner by means of suitable procedures, taking into account the nature and severity of the situation reported in order to clarify the incident following reports on situations that may be considered sexual harassment or assault.

In the evaluation process, maximum respect is shown to the victims or perpetrators of social gender based harassment, sexual harassment and sexual assault and to the persons that are witnesses or persons that raise the situation in terms of human dignity and the right to privacy.

Sexual harassment or assault are often cases that occur between two people, that can remain vague in the intimate and complex area of interpersonal relationships, and therefore are not easy to evaluate and prove. Therefore, even if the person who thinks that he/she is subjected to sexual harassment or assault is not sure of the nature of the incident, raising the issue to the unit or person to guide him/her shall be the first step and he/she must be encouraged and supported on this matter. In the absence of material evidence, it shall be acted upon the nature and context of the incident.

It is strived to protect persons who have made a complaints for retaliation.

Intentional False Statements; Necessary sanctions are applied in cases where the claimant has lied intentionally and gave false statements in any way after the applications made to the unit.