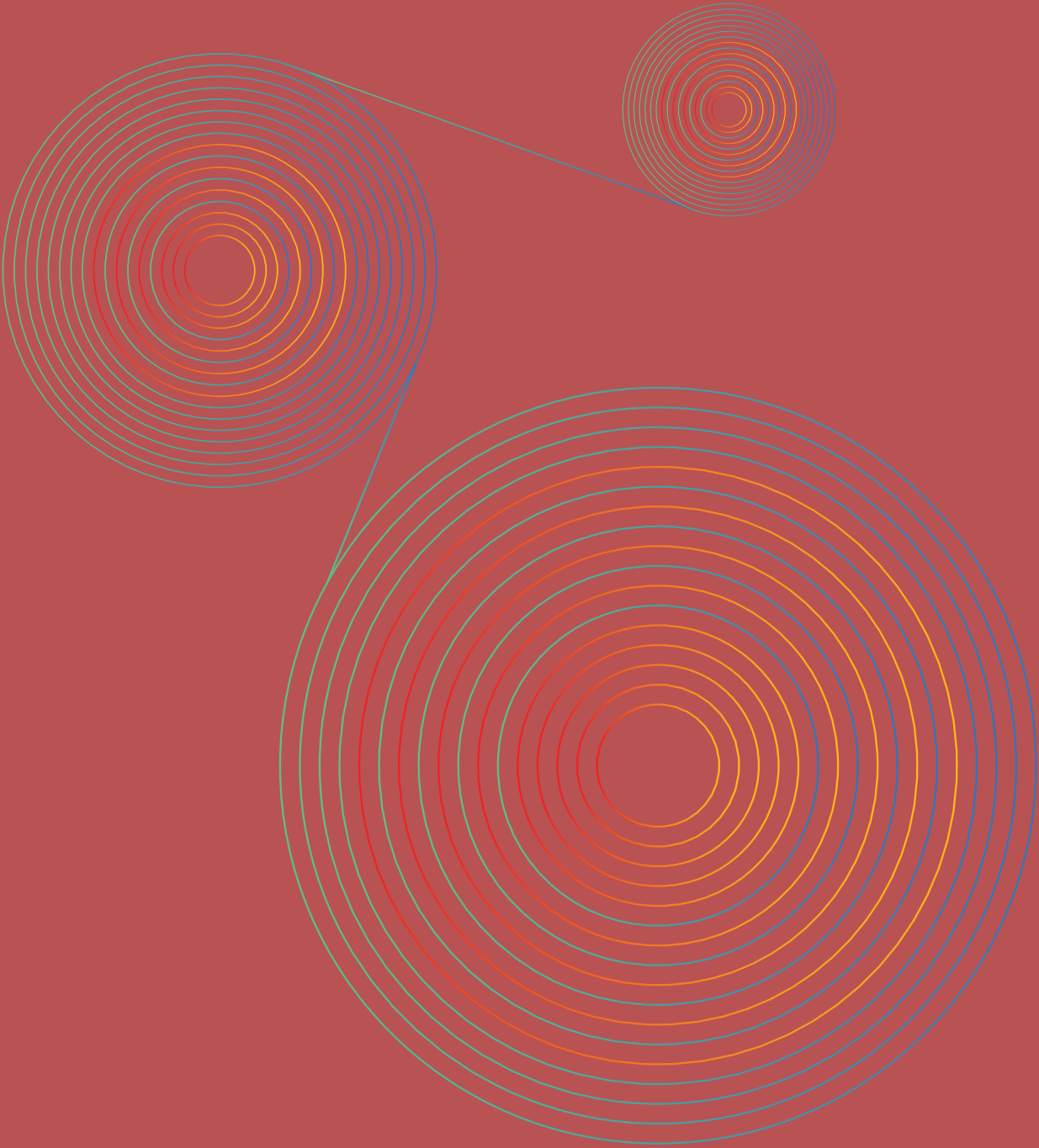


# Good Practices of BADV Companies in Combating Domestic Violence

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Business Against Domestic Violence Network



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# About Business Against Domestic Violence Project and Business Against Domestic Violence Network

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**The Business Against Domestic Violence project** was launched in 2014 by the Sabancı University Corporate Governance Forum with the support of the Sabancı Foundation and the UNFPA (United Nations Population Fund) and in collaboration with TÜSİAD (Turkish Industry and Business Association). By using the managerial and organizational capacities of the business world, the project aims to create support mechanisms at workplaces for employees who experience intimate partner violence and to disseminate best practices, tools, and methods in order to reduce domestic violence.

Within the scope of the project, we conducted a survey in 20 companies in 2014 in order to investigate employees' awareness of domestic violence and their exposure to violence. The survey results showed that 75% of white-collar female employees, most of whom are university graduates, have been subjected to some form of violence at least once while 40% have been subjected to psychological/emotional violence, 35% to social violence, 17% to economic violence, and 8% to physical violence. Drawing on these results, we launched the second phase of the project where we developed "A Guidebook to the Development and Implementation of Company Policies Regarding Domestic Violence against Women". The aim of the guidebook was to support companies in devising company policy documents and mechanisms to prevent working women from being negatively affected in the workplace and to ensure the effective participation of working women in the labor force.

Aiming to raise awareness about domestic violence in the business world and to improve women's working environments so that they can play a more active role in work life, the project identifies ways to prevent domestic violence and create support mechanisms by using the managerial and organizational capabilities of the corporate world. The pilot implementation started in 2016, while the Guidebook implementations continued in 2017. Between 2016 and 2022, 99 companies and municipalities took part in the implementation and were involved in the development processes of domestic violence policies.

Companies that took an active part in the project not only developed domestic violence policies but also updated all company policies through a gender equality lens in line with the recommendations put forth in the Guidebook. These policies cover numerous subjects such as workplace safety, workplace security, performance evaluation, and employee support. The policies that are most widespread and most favorably received by employees are as follows:

- Additional paid leave for employees who have experienced violence,
- Planning workplace safety and security together with employees at risk,
- Providing psychological and legal support services,
- Developing personalized performance evaluation practices that take into account extraordinary personal circumstances,
- Organizing trainings to raise awareness on gender-based violence in the company,
- Building ongoing internal and external communication channels on the significance of gender equality,
- Recognizing gender equality and especially domestic violence (by a current or former partner, fiancé, etc.) as a workplace issue and involving the company's top administration while communicating these issues.

**Business Against Domestic Violence Network (BADV Network)**, was established in 2022 as a new development to support the sustainability of the Business Against Domestic Violence project with the support of UNFPA and Sabancı Foundation and hosted by TÜSİAD. The aim of the network is to strengthen the communication between over 100 companies that have been involved in the different phases of the project and to enhance the inspiration and information-sharing among them.

BADV Network aims to make use of the organizational capacities of the companies in the network in order to create ways to prevent domestic violence, support those who are exposed to domestic violence, raise awareness on women's rights in the corporate world, increase the interaction between companies focusing on this field through experience-sharing activities, and disseminate good practices in companies.

### **Good Practices of BADV Companies in Combating Domestic Violence**

This booklet outlines the principles, policies, and practices of the companies in the BADV Network, with the aim of minimizing the impact of domestic violence against women in work, workplace, and employees. In order to collect this information, a survey was sent to all companies in the Network in November and December 2022, and this document was prepared based on these responses.

The booklet aims to render visible the Network companies' policies and practices which were devised in an effort to act jointly while combating domestic violence, to learn from each other's knowledge and experiences, and to guide all actors in the corporate world. In addition to the policies and practices implemented by companies within the scope of combating domestic violence, the booklet presents the company practices for ensuring gender equality –a part of combating domestic violence– and their collaborations with civil society and academia.

# Akçansa Cement Industry and Trade Inc.

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Akçansa Cement Industry and Trade Inc. (Akçansa) created its “Gender Equality Policy” in April 2019. The document aims to provide its employees with an egalitarian, fair, inclusive, safe, and positive working environment against all forms of violence. Being the first company in the Sabancı Group to publish a policy document on domestic violence and gender equality, Akçansa pledges to directly support or direct to relevant institutions all its employees who have been exposed to or who are at risk of domestic violence and discrimination.

In 2021, the company revised the “Gender Equality Policy” which was created in 2019 and expanded its scope. The final version of the policy document includes definitions of violence and forms of violence as well as harassment and its various forms. In the document, domestic violence is defined in a way to cover all forms of violence that occurs in close relationships. In addition, a “Gender Equality Manifesto”, which draws attention to the commonality in the struggle against violence and struggle against gender inequality, was annexed to the policy document. An important aspect of the policy document is that Akçansa emphasizes its main purpose as creating an institutional culture that is to prevent the occurrence of violence and harassment.

The policy document applies to all Akçansa personnel and subsidiaries in Turkey.

The company has also organized a series of events to ensure that this policy document, the declaration of the company’s corporate position on violence, is known and adopted by the employees. First, the policy document was notified to all employees via e-mail. In addition, the company prepared a booklet for blue-collar workers explaining the purpose and scope of the document, posters promoting the policy, and stickers with quotations from the Gender Equality Manifesto. These stickers were also attached to the gift packages purchased from the “Migrant Women” platform in Istanbul to be given on March 8, International Women’s Day.

All employees are responsible for the due implementation of the policy, and the Human Resources Function is tasked with reviewing and updating the document.



## Precautions, Supports, Sanctions

Akçansa directs its employees who are exposed to domestic violence to relevant social institutions for them to access the information and support they need. Although the company has promised in its policy document to establish institutional mechanisms to provide relevant support to its employees who are subjected to domestic violence, it currently does not provide any support within the company except for guidance.

The company has committed that, in case an employee is exposed to violence, it will carry out the entire process on the basis of the “zero tolerance to violence” principle and in accord with the confidentiality principle. In addition, the policy document recognizes that the employee who is exposed to violence may experience instantaneous and unexpected problems and states that in such cases the necessary support will be provided by the company. However, these supports are not detailed in the document.

If an employee uses workplace resources (phone, fax machine, e-mail, mail, company cars, office supplies, photocopy machines, etc.) to commit or to threaten to commit domestic violence, s/he shall be subjected to disciplinary proceedings, including but not limited to dismissal.





## Awareness Raising

Akçansa has been receiving gender equality trainings from Y+O Education since 2018. Trainings that had initially begun face-to-face were switched to online during the pandemic. As of today, approximately 300 people have attended these trainings. Gender equality training has also been added to Akçansa Digital Academy, the training portal of the company. Thus, gender equality training was made a part of the compulsory training for the new recruits. In addition, Akçansa Next Seminars are organized every 8th of March, International Women's Day, with the participation of experts on the subject in question. So far, nearly 200 people have attended these seminars.

Collaborating with civil society, Akçansa also endeavors to expand the scope of awareness-raising activities. One such collaboration is called the "Barber Shop Talks" organized in 2020 with the aim of breaking gender stereotypes with the Yanındayız Association. About 50 people attended this event.

Another important awareness-raising work is the #BenimleGelecek (Future with Me) project organized by the Cement Industry Employers' Association (ÇEİS) in 2021. This project aimed at prompting pro-gender equality changes in thinking and behavior in the cement industry. In the project,

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#### **ŞİDDETİN HER TÜRÜ İSE BİZİ BİRBİRİMİZDEN AYIRIR!**

Cinsiyet, dil, ırk, siyasi düşünce, inanç, din, mezhep, cinsel yönelim, yaş, engel durumu ve benzeri kişisel özelliklere gösterilen saygı **bizi birbirimize bağlar!**

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Akçansa olarak; Birbirimizin sağlığını ve güvenliğini önemsemek, toplumsal cinsiyet eşitliğine ulaşmamızı sağlayacak, kadınların toplumda, iş ve ekonomik hayatta güçlenmesine yönelik adımlar atmak, eşit fırsat, hak ve sorumluluk dağılımı ile insana 'insan' olduğu için verilmesi gereken değere sahip çıkmak, **taahhüdümüzdür!**

**AKÇANSA**

ÇEİS established an indirect collaboration with AÇEV (Mother Child Education Foundation) As part of this project, AÇEV opened its online training titled "I am Aware of Equality" for the access of ÇEİS member companies such as Akçansa. In addition to the collaborations with civil society and experts in the field, Akçansa also gives importance to benefiting from the knowledge and experience of other companies. In this sense, it came together with Boyner Group in 2020 to exchange ideas on the support mechanisms to be offered to employees exposed to violence.



# Aydem Energy

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Aydem Energy adopted the policy document called “Procedure for Combating Domestic Violence” in 2021. The company shared the document with the public and employees via a message from the company CEO which emphasizes that domestic violence is a human rights violation at the center of which lies gender inequality.

The policy document was written by the “Aydem Equal Life Team” which also participated in BADV trainings. The document aims to provide an egalitarian, safe, and non-violent working environment and not only applies to the group companies, production sites, and subsidiaries but also serves as a guide for subcontractors, suppliers, and third parties.

One of the most original aspects of the document is the definition of domestic violence. The document defines domestic violence broadly in a way to include not only violence in the nuclear family, in which partners are related by wedlock, but also all forms of violence that occurs in the extended family as well as all forms of intimate relations that people deem as family. With this definition, Aydem Energy not only underlines the nature of domestic violence as committed by someone emotionally close, but it also makes it possible for a much wider group of employees to benefit from the support provided within the scope of this document.



## Procedure and Principles of the Application Mechanism

Aydem Energy has developed a special structure that will contribute to the mainstreaming and sustainability of the struggle against domestic violence. This structure supports the relevant authorities of the company and works in cooperation with them. At the center of this structure is the “Committee for Preventing and Providing Support against Domestic Violence” (AİŞKÖDK). Formed in 2021, AİŞKÖDK is tasked with evaluating internal and external domestic violence applications and coordinating the provision of support. The committee was established as part of the BADV Project and consists of seven senior executive members trained in domestic violence and gender equality. The powers and responsibilities of the committee are given in detail in the document called “Directive on the Working Principles for the Committee for Preventing and Providing Support against Domestic Violence”. The directive clearly explains the methods and practices that will enable the implementation of the principles and commitments put forth in the policy document. Another pillar of AYDEM’s anti-violence structure is the Family Support Line and a separate e-mail address assigned only for domestic violence applications. In addition to these units which were all created specifically for combatting violence, the Aydem Equal Life Team (AEHE), which is responsible for carrying out activities focusing on gender equality, diversity, and inclusion and has prepared the policy document, is defined in the company’s policy document as a unit to contribute to combating violence.

The Human Resources Group Directorate, together with the Audit and Legal Departments, is authorized for the operation of the structure described in the policy document, implementation of all the pledges on the document, and creation of a safe working environment. Internal Audit and Control Group Directorate evaluate internal and external reports and direct them to HR and AİŞKÖDK in order to provide the support needed.

The other pillars of this holistic struggle that aim to effectively support those who are exposed to violence are the Corporate Communications Directorate and Aydem Academy. Aydem Academy works to institutionalize the fight against domestic violence in the workplace in accordance with international norms and standards, especially the Istanbul Convention and the ILO Violence and Harassment Convention (No. 190). The company has developed a comprehensive strategy for combating violence and created special units to implement this strategy. In doing so, it has taken into account the structural relation between the goals of achieving gender equality and the fight against domestic violence, thanks to the existence of AİŞKÖDK and AEHE units.

A person, who is directly or indirectly exposed to domestic violence, who witnesses violence, or is subjected to violence by the company employee, can apply to Aydem Energy Ethics and the workplace doctors as well as to all the above-mentioned units even if they do not work in Aydem. Aydem Energy is an exemplary company not only with the mechanisms it created but also with the methods and principles it has adopted in the application process. First of all, the person who states that s/he has been exposed to violence does not have to prove it. Right from the start of the application process and at all stages that follow, the best interest of the applicant is considered, no steps are taken without his/her knowledge and consent, his/her privacy is respected, and confidentiality is protected.



## Precautions, Supports, Sanctions

The Directive on the Working Principles for the Committee for Preventing and Providing Support against Domestic Violence pledges to support the employees who are exposed to violence to help them stay away from violence and its effects. The supports provided are as follows:

- If needed and requested, the employee can take paid administrative leave for up to 10 working days,
- The employee can be given a one-off advance or unrequited additional payment with the upper limit of one gross salary,
- The employee can be allowed for flexible working hours,
- The performance criteria are re-evaluated, taking into account the employee's experience of violence,
- The employee can get 24/7 free and unlimited legal and psychological counseling from the Domestic Violence Hotline and four sessions of face-to-face psychological counseling.



In addition to these supports, the actions that the company will take when needed to protect the employee's safety are as follows:

- Changing the working hours and work location of the employee,
- Changing the employee's business contact information (phone and e-mail),
- In case the employee uses a company vehicle, changing the company vehicle or its license plate,
- Allocating a place for the employee's private vehicle in the company carpark,
- Changing the employee's salary bank account,
- Implementing the restraining order, if any, within the scope of Law No. 6284, and preventing the perpetrator from reaching the employee through the company's central office.

Among the actions in question are training the security subcontractor on violence against women and adding this subject to the security plan.

The Committee on Combating Domestic Violence and the Human Resources Group Directorate have the authority to decide on the relevant security actions.

If requested, the company can also offer psychological support to its employees who commit domestic violence in order to end violence. After the act of violence is legally established, Aydem Energy has the right to terminate the employment contract unilaterally by giving the perpetrator their legal rights.

Persons who are exposed to violence are also informed about the external mechanisms and are directed to relevant public institutions and non-governmental organizations in accordance with their needs.

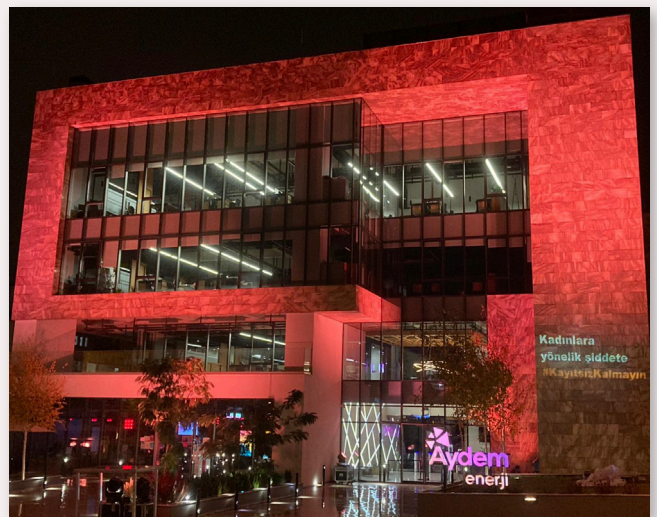


## Awareness Raising

Aydem Energy also endorses its approach to combating violence, which it has committed to in its policy document, with informative and awareness-raising activities. It has organized numerous activities to that end. These activities can be listed as follows: introducing the policy document to its employees via e-mail, SMS, smart TVs, and informative boards in the workplace; organizing trainings, webinars, and seminars on domestic violence and gender; periodically reminding the employees of the contact information on the emergency hotlines using different tools; and disseminating this information by preparing written and visual awareness raising materials.

Following the issuing of the policy document, representatives who had attended the Sabancı University Corporate Governance Forum's training of trainers, gave training to HR teams and team managers. Nearly 200 people attended these trainings. The company also organized a webinar where support mechanisms that can be applied inside and outside the company in case of domestic violence were explained. More than 600 employees attended this webinar. In addition to these awareness-raising trainings, voluntary trainers trained in Aydem Academy give periodic gender equality trainings. In one year, more than 1000 people attended these trainings, given online by 30 voluntary trainers.

In another activity through which the company attains visibility in combating domestic violence, it participates in the differently-themed annual campaigns organized by the UN within the scope of "16 Days of Activism" to combat gender-based violence between November 25 and December 10. Within the scope of the 2021 campaign, the company lightened in orange the exterior surfaces and streets of the company buildings in Aydın and Denizli and projected the slogan "Don't be #indifferent to violence against women" on the building façades. In addition, a video was shot demonstrating the company's support for the campaign with the participation of employees. The company also endorsed the "She Said No" campaign launched by the UN on November 25, 2022. Again, during the UN's 16 Days of Activism campaign in 2022, the company, in cooperation with the Federation of Women Associations of Turkey (TKDF), added the emergency hotline numbers of the TKDF behind the electricity bills of 5.5 million customers in Aydın, Denizli, Muğla, İzmir, and Manisa to which it supplied electricity.



# Barilla Turkey

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Barilla Turkey adopted its “Prevention and Support Policy Against Domestic Violence” in 2019. The aim of the policy document which was developed with an approach promoting diversity and participation is as follows: to raise the awareness of all employees about the issue, to develop mechanisms where employees who are exposed to domestic violence can receive support in a trusting environment in which confidentiality is guaranteed, and to provide a workplace environment that will encourage the person to take steps to get away from the negative effects of violence in their lives.

The policy document details the definition and forms of domestic violence, the support mechanisms offered by the company, the application mechanisms, the methods and principles adopted in the application process, and the powers and responsibilities of the units that will be involved in this process.

One of the prominent features of the document is that it provides an inclusive definition of the family. Barilla Turkey, in the document, does not limit the definition of family to whether there is wedlock, whether the marriage bond continues, or whether the relation in question fits into the definition of extended family. Rather, it adopts a broader definition in a way that includes the people whom one feels close to and defines into the family. This being the case, Barilla Turkey defines domestic violence as a form of violence that a person is exposed to by his/her relatives and which takes place within this wide network of relations. With this definition, Barilla Turkey does not only underline the fact that a person might be subjected to violence by someone who is emotionally close, but it also expands the scope of the situations and supports to be given to employees in the policy document.

The policy, carried out by Human Resources under the sponsorship of Barilla Turkey General Manager, covers all Barilla Turkey employees.



## Procedure and Principles of the Application Mechanism

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A Barilla Turkey employee who has been exposed to violence can apply directly to his/her manager, a person from the administration with whom s/he feels comfortable, the Human Resources Department, union representatives, or a workplace nurse for information and support. In addition, the Human Resources Senior Manager can be contacted via a particular e-mail address and phone line assigned for domestic violence cases. If the applicant wishes, s/he can submit an anonymous application. The applicant can convey his/her experience of violence as in detail as s/he wants, or s/he can apply only by notifying the case of violence.

The entire application process guarantees confidentiality on the basis of the principle of privacy of the applicant, and no information shall be shared with third parties unless the person's consent is obtained.

One of the most original and important operational criteria adopted by Barilla Turkey during the application process is that the company takes the statement of the applicant who has been subjected to violence essential. Aware of the difficulty of the person who has been subjected to violent experiences in taking a step in this regard, the company states that, in the absence of evidence, the statement of the applicant shall be considered essential, and relevant support mechanisms shall be put into practice in line with the applicant's statement.



## Precautions, Supports, Sanctions

Barilla Turkey acknowledges that the employees who are exposed to violence may experience related problems such as chronic absenteeism, being late for work, and poor performance and pledges to adopt a supportive attitude in this regard. In line with the principles put forth in the policy document, the company provides the following support to employees, who have stated that they have been exposed to any form of domestic violence:

- Giving paid administrative leave up to 10 working days apart from the employee's right to annual leave and reevaluating this period, if necessary,
- Allowing the employee to use the paid leave flexibly: for instance, giving the employee a leave for a few hours or changing scheduled leave days,



- Rearranging working hours,
- Changing the workplace where possible,
- Paying advance with the upper limit of a monthly salary and not to exceed once a year,
- If requested by the employee who has been subjected to violence, offering the opportunity to deposit the advance into another bank account of the employee,
- Changing the business phone number (mobile and/or internal),
- If the employee drives a company vehicle, changing the vehicle upon request,
- Allocating a place for the employee's private vehicle in the company carpark,
- When needed, prevent the perpetrator from reaching the employee through the company's central office.

In addition to the support listed above, Barilla Turkey offers unlimited legal and psychological counseling through the AVITA Employee Support Line as well as 6-session face-to-face psychological counseling. This service is given in complete confidentiality. There is no obligation to disclose the names of the applicants, and there will be no reporting that might compromise confidentiality. Employees, who want to use this service, can contact AVITA directly without obtaining approval from any unit.

If the workplace address is also determined as a protected area in the restraining order issued by the applicant within the scope of Law No. 6284, the applicant must submit a copy of the measure decision to the Human Resources Department.

The Human Resources Department decides on all support to be given to the employee exposed to violence. When deemed necessary, the Human Resources Department may decide to take different measures other than the ones mentioned above.

Barilla Turkey has also declared in its policy document that, if any employee uses workplace resources to commit or threaten to commit domestic violence, the company has the right to subject the employee to disciplinary action.



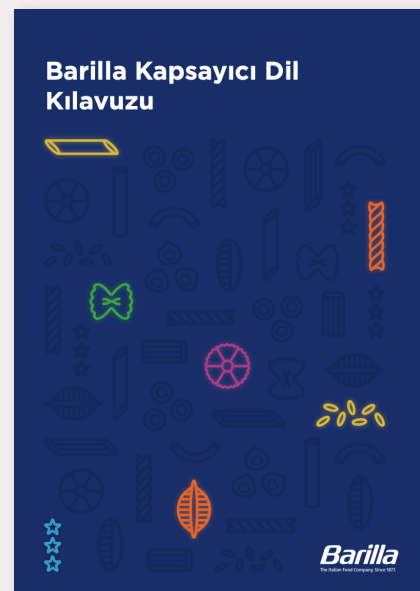
## Awareness Raising

Barilla Turkey offers the employees awareness-raising training on combating domestic violence. There are many well-trained trainers who have received the training of trainers at the BADV Project. These trainers adapted their training to the company and gave trainings in the Istanbul and Bolu branches of the company. A total of 250 blue- and white-collar employees participated in the trainings. In addition, the company organized various events to raise awareness through Hand in Hand/El Ele, the employee resource group which was formed in 2021. For instance, during the pandemic, especially during the lockdowns, the company sent reminders regarding the domestic violence policy as well as the mechanism that employees exposed to violence could apply. Besides, information notes on forms of violence were written and communicated with the employees via e-mail.

Barilla Turkey also reinforces its commitments in the policy document by forming strong collaborations with civil society. Among these collaborations were online and face-to-face events on gender equality and domestic violence organized in cooperation with Yanındayız Association and the Federation of Women Associations of Turkey (TKDF). Apart from civil society collaborations, Barilla Turkey organized seminars on inspirational stories in an effort to benefit from the knowledge and experience of the business sector on the subject. In addition, Barilla Turkey organizes various in-house awareness-raising activities within the scope of the UN's "16 Days of Activism" campaign to combat violence against women, which starts on November 25 and ends on December 10 every year.

As part of the combat against domestic violence, Barilla Turkey also works to ensure gender equality within the company. For the last three years, it has focused on working to transform inequality, especially in departments where the number of female employees is low, such as the supply chain. As of 2022, it has started to give priority to increasing the number of women in the sales department and in managerial positions with the launch of the "Women in Sales" program. Therefore, over the next two years, it plans to carry out various activities aiming to attain a male-female balance in the sales department.

Another important gender equality activity of the company is the "Inclusive Language Guide" prepared in collaboration with the Gender and Women's Studies Center of Excellence (SU Gender) team. Based on the principle that the language used in the company is the basis of communication with the employees, the guide draws attention to the need to change the language that reproduces various forms of discrimination and inequality in order to create a working environment that is inclusive and free from all kinds of violence. The guide also presents egalitarian and inclusive alternatives to sexist and discriminatory expressions in everyday communication, demonstrating concretely how the use of language can be transformed in favor of equality and inclusiveness.





# BASF Türk

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BASF Türk issued its “Support Policy for Combating Domestic Violence” in 2018. The policy document was communicated to all employees with the CEO’s message and the public through social media as a part of the November 25 International Day for the Elimination of Violence against Women. The aim of the policy is to raise awareness about domestic violence, to provide an egalitarian, safe, and violence-free work environment, and to inform employees who are exposed to violence about the application mechanisms inside and outside the company.

The policy document defines domestic violence as all attitudes and behaviors of one person to gain power and control over another, which might occur in all forms of short-term or long-term relationships between married or unmarried people who might or might not live in the same household. Thanks to this definition, this policy is inclusive of all acts of violence that occur in intimate relationships. Thus, it encompasses both the acts of domestic violence and the diverse set of employee profiles to be supported within the scope of the policy.



## Procedure and Principles of the Application Mechanism

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A survivor of domestic violence may contact and seek support from any Human Resources Officer and/ or department managers. Given information about the application mechanisms within and outside the company, the applicant is encouraged to apply to the relevant public and civil society organizations and support in line with the request.

During the application process, BASF Türk respects the privacy and personal rights of the applicant at the highest level.

If the perpetrator is a company employee, BASF Türk acknowledges that the perpetrator might need help and resources. In such cases, the person can benefit from the “Employee Support Program” and can receive unlimited psychological counseling by phone as well as six sessions of face-to-face counseling. This support process is carried out with the utmost attention to the privacy and personal rights of the person, just as the procedure for the employee who is exposed to violence. Any employee who has been found to have committed domestic violence using workplace resources shall be subjected to disciplinary measures, including dismissal.



## Precautions, Supports, Sanctions

After the employee exposed to domestic violence notifies the company, the company may take the following precautions upon the employee's request:

- Changing the vehicle and/or the plate number, if the company uses a vehicle,
- If s/he uses a company shuttle, s/he is picked up and dropped off in front of his/her home and if the accommodation address changes, s/he is transferred to the respective shuttle,
- Changing the work number of the employee and/or removing him/her from the employee contact lists,
- Changing the e-mail address,
- Providing the employee with the option to work in another branch of the company located elsewhere,
- Making changes in working hours,
- Providing six face-to-face psychological counseling as well as unlimited psychological and legal counseling via phone within the scope of the "Employee Support Program",
- If needed, allow the employee to take paid administrative leave for a period determined together with Human Resources and the department manager.

After an employee exposed to domestic violence applies to the official authorities, the company may also take the following measures upon request:

- When needed, providing non-repayable financial support in the amount of monthly gross salary, not to exceed once a year,
- Providing unpaid leave for a maximum of six months by the Human Resources and the line manager by offering flexible working opportunities and guaranteeing re-employment.



## Awareness Raising

BASF Türk has emphasized that awareness-raising efforts have had a significant impact on reducing violence in the workplace, making the causes of violence visible, and combating violence. In line with it, BASF Türk carries out informative and awareness-raising activities on domestic violence and gender equality.

Informative e-mails were shared on different types of violence, application mechanisms for domestic violence, communication methods with people who have been exposed to violence, and expert interviews have all taken place. In addition to the gender equality trainings, events about women's rights and gender roles were held with guest speakers from various associations and non-governmental organizations, and the "Father Support Program " was provided to the company's employees as part of the cooperation with AÇEV.



# Boyner Group

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Boyner Group published its policy document titled “We Are Together Against Violence Against Women” in 2022. The aim of the document is to raise the awareness of employees on domestic violence in line with the company visions of “creating a business and working environment befitting human dignity” and “management that focuses on people” as well as to implement practices that support employees who are exposed to or at risk of domestic violence.

The policy document was written by the committee as part of the “We are Together” project, which is carried out by the same committee consisting of participants from the Sustainability, Human Resources, Corporate Communications, and Academy (Training) departments. The committee is also responsible for the implementation, monitoring, and updating of the policy document.

The document defines domestic violence as any form of violence that occurs within the family, within the household, or between other members of the family, regardless of whether the person who is exposed to violence and the perpetrator share the same household. In addition, the policy document gives information on the methods and procedures that the company will follow in supporting the employees exposed to domestic violence. The document covers the entire body of Boyner Group employees.

The adoption of the policy document was presented to all company employees via an email sent by the general manager on March 8, 2022, and communicated with the public through social media posts.



## Procedure and Principles of the Application Mechanism

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An employee who is exposed to domestic violence at Boyner Group can apply directly to the line manager, the Human Resources Department, the Ethics Committee, or call the Violence Emergency Hotline of the TKDF within the scope of the protocol signed with the TKDF. The applicant is informed about the support mechanisms inside and outside the company; s/he is referred to the relevant public and non-governmental organizations in line with his/her needs; s/he is encouraged to apply to these organizations; and the person exposed to violence is provided with support within the company.

The entire procedure is conducted in confidentiality, with the consent of the applicant, and respecting the privacy of the employee.



## Precautions, Supports, Sanctions

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Boyner Group has formed long-term collaborations with two different non-governmental organizations in order to provide the social, legal, and psychological support needed by its employees who are exposed to domestic violence. The first one is the protocol signed with TKDF, which operates the Domestic Violence Hotline. With this protocol, any Boyner Group employee who has been exposed to domestic violence can call the Emergency Helpline and access legal, administrative, healthcare, social, etc. support as well as guidance in these subjects. The Emergency Helpline works on the basis of confidentiality principles. However, in cases where the person exposed to violence needs preventive or protective measures in the workplace, the relevant information is shared with the Boyner Group after consent was obtained from the employee in question. The second collaboration is with “gonullupsikolog.org”, which offers free online psychological counseling to people who need support. This collaboration provides Boyner Group employees with free online support from psychologists in the “gonullupsikolog.org” network. Employees who are under the threat of domestic violence and the relatives of those who are exposed to violence can also benefit from this support.

The company also provides the following support to its employees who are exposed to domestic violence, depending on their needs and in line with the company procedures:

- A salary worth of advance payment, not to exceed once a year,
- Administrative leave up to 10 days,
- The right to change the workplace/store where s/he works,
- Free legal counseling from the company's legal department or the law firm it works with.

Apart from the support listed above, Boyner Group also takes the following security measures in accordance with the needs of the employee:

- The request to change the transportation route and vehicles to the workplace can be assessed by the Human Resources Department.
- The perpetrator's access to the workplace may be prevented.
- The possibility of changing the working area, when necessary, can be evaluated by the Human Resources Department.
- If the debit card and bank accounts are under the control of the perpetrator, the salary payment can be done in alternative ways.

Boyner Group supports not only the employees who are exposed to domestic violence but also the employees who want to form solidarity with those who are exposed to domestic violence. This approach, one of the distinctive features of the company's support mechanism, enables an employee, who wants to be with his/her friend exposed to violence to help his/her friend to get away from violence, to take up to two days of paid leave.

Boyner Group also takes precautions to prevent violence if the perpetrator is a company employee. It directs both the person who is exposed to violence and the perpetrator to receive psychological support in line with their demands and consent. In addition, after making necessary evaluations, the company, taking into account the severity of the act of violence, can take necessary legal actions including sending the perpetrator to paid annual leave and terminating the employment contract with valid or justified reasons.

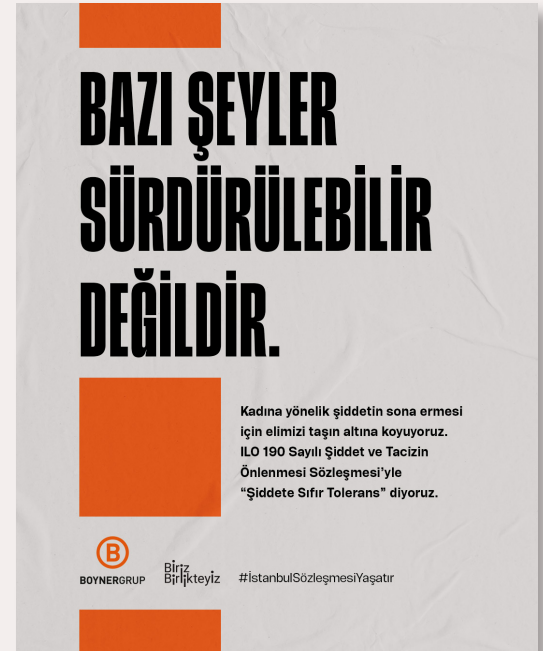


## Awareness Raising

Boyner Group organizes trainings, workshops, and online seminars to raise awareness about domestic violence through its collaborations with TKDF, Volunteer Psychologists Network, and BADV. It aims to ensure that all employees participate in these online and/or in-person awareness activities. More than 150 employees participated in two online trainings given by the Volunteer Psychologists Network. Online trainings and seminars on domestic violence were recorded and added to the training catalog of Boyner Academy. This way, every employee who is interested in the subject can access the relevant content at any time.

With the written and visual materials on violence, the company shares its attitude toward domestic violence with the public. It prepares written and visual materials on a theme determined on March 8, International Women's Day every year and disseminates them on social media accounts.

Boyner Group announced that it has adopted the "Zero Tolerance to Violence" principle with reference to the ILO Violence and Harassment Convention (No. 190), currently, the first international convention to eliminate violence and harassment in work life. Thus, the company has pledged to create a work environment that is free from all forms of violence, respects human rights, and befits human dignity.



# Enerjisa Enerji

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Enerjisa Enerji issued its policy document titled “Zero Tolerance to Violence” in 2022. Prepared by the joint work of the Sustainability and Communication, Harmonization and Law, and Human and Culture teams, the aim of the policy is to determine the principles and sanctions needed to create an egalitarian, safe, and violence-free working environment. With this document, the company pledges to organize activities to raise awareness about violence; to create a work environment where employees who are subjected to violence can share in confidence and confidentiality; to create support mechanisms in the working environment; and implement effective mechanisms for investigating and determining relevant sanctions in case of violence.

The policy document provides information on violence and forms of violence and gives guidance to employees on the internal and external application mechanisms as well as the support that can be requested in cases of domestic or workplace violence and/or harassment.

The document applies to all enterprises within Enerjisa Enerji, all employees, and the top management. However, the company expects its suppliers and business partners to comply with the principles set out in this policy.

The adoption of the policy document was announced to the company employees via the management system, e-mail, and mobile application. The document is shared periodically, especially on relevant days.





## Procedure and Principles of the Application Mechanism

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An employee who is exposed to domestic or workplace violence or harassment can apply to the line manager and the Directorate of Culture and Labor Relations, or s/he can call the Anti-Violence Hotline which was created solely to support cases of gender-based violence and harassment. An employee can also make an anonymous application. The company pledges to effectively operationalize the due process (including review, inspection, and audit) by obtaining the approval of the applicant at every stage of the way and taking into account his/her privacy.



## Precautions, Supports, Sanctions

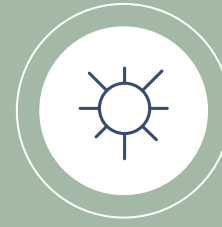
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Enerjisa Enerji undertakes to provide the following support if the employee who is exposed to violence has taken measures pursuant to Law No. 6284:

- Rerouting the shuttles,
- Escorting the employee to the shuttles or public transport,
- Providing a parking lot for the employee's private car,
- Changing information such as workplace location, work phone, and e-mail address,
- Changing the account information to which the salary and employment benefits will be paid,
- Granting paid administrative leave to the employee in a way to not compromise his/her annual leave rights,
- Providing psychological support through the Anti-Violence Hotline.

In addition to the list above, the company commits to take necessary measures if the person is exposed to violence and the perpetrator works in the same company so that the perpetrator would stay away from the person exposed to violence.

If the person committing or threatening to commit domestic violence is an employee, the company agrees to investigate the case in accordance with the relevant legislation and internal procedures and may impose a disciplinary penalty on the person in question.



## Awareness Raising

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As committed in the policy documents, Enerjisa Enerji also organizes awareness-raising activities on violence. In this context, the company organized online events as part of the March 8 International Women's Day and November 25 International Day for the Elimination of Violence against Women. In addition, it makes announcements about the UN's "16 Days of Activism" campaign (between November 25 and December 10 every year) to its employees and stakeholders and participates in these campaigns with written and visual materials posted on social media.

Enerjisa Enerji also gives importance to raising awareness about domestic violence among its customers. To that end, it uses electricity bills as a message board through which to encourage people who have been subjected to violence to apply to public authorities and gives information about the public support mechanisms for combating violence at the bottom of the bills that it sends to 10 million subscribers in 14 provinces every March.

# Ford Otosan

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Ford Otosan published the policy document named “Guide for Combating Domestic Violence and Abuse” in 2022. The aim of the guide is to announce the company’s approach of zero tolerance to domestic violence and abuse, to define the support mechanisms for employees, and to inform the employees of these supports.

The guide announcing the company’s non-violence policy was introduced at a meeting with all HR leaders.

The guide defines domestic violence as any form of violence or neglect inflicted by a family member on another. Violence committed by one of the partners on another in non-marital relationships is also considered domestic violence.



## Procedure and Principles of the Application Mechanism

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A Ford Otosan employee who is exposed to domestic violence can directly apply to the person authorized for this purpose in each company or send an e-mail to @ford.com.tr. The names and phone numbers of the authorized personnel in the companies are included in the guide. In addition, the contact information of public and civil society institutions from which to get support is also featured in the guide.



## Precautions, Supports, Sanctions

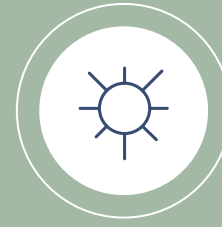
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With the guide, the company pledges to provide the following support to the employees subjected to domestic violence:

- Changing shuttle routes,
- Changing locations/shifts,
- Paid administrative leave,
- Advance payment,
- Providing companions for the employee exposed to violence,
- Making changes in the contact information of the employee,
- Free psychological counseling.

Ford Otosan Human Resources Department is responsible for providing support to employees exposed to violence. Ford Otosan also undertakes to conduct the entire application process in confidentiality.

In case the perpetrator of domestic violence is a company employee, the necessary disciplinary investigation is carried out by taking into account the provisions of Ford Otosan Disciplinary Regulation, the Labor Law, and other relevant legislation.



## Awareness Raising

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Ford Otosan has carried out various works both to raise awareness about the guide within the company and raise awareness on domestic violence. Some of these activities are as follows: visibility materials (brochures, posters, etc.) declaring the company's "zero tolerance to violence" policy were prepared, and these posters were hung in places, especially in the toilets and changing rooms. In addition, the company decided to frequently share the subject via the internal communication network "Yammer". In another important activity, the company planned to organize an online seminar where the definition and forms of violence, as well as the rights of the parties in the divorce process, will be discussed.

Ford Otosan has also set out to add new supports to the existing ones. Drawing on the United Nation's "16 Days of Activism" between November 25 and December 10 to combat gender-based violence, Ford Otosan determined the theme of awareness-raising activities to be "partner violence". Within this scope, the company collaborated with Kocaeli Bar Association, and volunteer lawyers agreed to provide free legal counseling to employees who are exposed to violence.

# Güven Healthcare Group

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Güven Healthcare Group issued the “Güven Hospital Policy Document on Domestic Violence against Employees” in 2019. The purpose of the policy document is to raise awareness about domestic violence, to give support and guidance to Güven Healthcare Group employees who are exposed to domestic violence, to raise awareness among the Güven Healthcare Group management on the subject, and to create a safer and more peaceful work environment.

The policy document defines domestic violence in a way to encompass all forms of violence perpetrated by one party to gain power and control over the other in intimate relations. Accordingly, the definition does not make a distinction about whether the relation is long- or short-term, the partners are married or unmarried, or the partners share or do not share a household. With this definition, Güven Healthcare Group not only emphasizes the destruction caused by the violence perpetrated by a person who is emotionally close, but it also makes it possible for a much wider segment to benefit from the scope of the document.

Aware of the fact that domestic and gender-based violence are the main causes of injuries and deaths faced by women in Turkey, the policy document covers all employees and their children.

The policy document was shared with the public at a launching meeting attended by all employees and the press on November 25, 2019, with the slogan “Güven’le, Güven’de, Güven’li”<sup>1</sup>. Promotion of the policy document continued with brochures and digital visuals prepared after the launch.

The responsibility for the implementation of the document is born by the Training and Organizational Development Directorate, while the responsibility for employee relations is undertaken by the Human Resources Directorate.

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<sup>1</sup> Güven literally means “trust” in English. That being the case, the slogan has a wordplay, meaning “At Güven, with Trust”.



## Procedure and Principles of the Application Mechanism

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A company employee who is exposed to domestic violence can call the Employee Support Program Domestic Violence Hotline established exclusively for domestic violence reporting or apply by sending an email to @guven.com.tr. In addition, the employee can apply to her/his manager or the Human Resources Directorate. Güven Healthcare Group informs the applicant about the support mechanisms inside and outside the company and directs them to the relevant public institutions and nongovernmental organizations for access to the needed support.

The company carries out the entire application process in confidentiality, with the utmost respect paid for the privacy of the employee who is exposed to domestic violence.







## Awareness Raising

Güven Healthcare Group organized trainings aimed at raising awareness among employees on domestic violence and gender equality, as well as informing managers on how to approach an employee who is exposed to domestic violence. 135 employees participated in the awareness raising trainings until March 2020, and 41 employees participated in the managers' training as of April 2020. The company had to suspend all these face-to-face trainings due to the pandemic. In this process, it decided to continue trainings with new trainers and also planned the new trainings in the period to come. Inhouse trainings were also supported by visual materials on domestic violence. These materials were hung in all common areas in order to raise awareness among the employees and the people visiting the hospital.

**ŞİDDET TÜRLERİ**

**Fiziksel Şiddet**  
Kişinin fiziksel saldırılara maruz kalması ve davranışlarının bu tür eylemlerde kontrol altına alınmaya çalışılmasıdır. Fiziksel şiddet her zaman iz bırakmayabilir ve dışarıdan fark edilemeyebilir.

**Sözel Şiddet**  
Kişiyi bağımsız, onurla alay etmek, suçlamak, yıkıcı şekilde eleştirmek, hakaret etmek, küfür etmek, isim takmak, kendine olan güven ve saygısını düşürmeye yönelik itham ve iddialarda bulunmak.

**Ekonomik Şiddet**  
Kişinin ekonomik faaliyetlerine müdahale etmek, kazancının elinden almak, çocuklarla ilgili harcama ve sorumlulukları üstlenmemek, kendisini ilgilendiren ekonomik kararlara dahil etmemek, ekonomik gereksinimlerini keyfi olarak kısıtlamak, diğer ihtiyaçları karşılamamak.

**Psikolojik Şiddet**  
Küsmek, baskı uygulamak, intihar etmek ile tehdit etmek, kışkırtmak, kişinin davranışları ve ilişkilerini sınırlamak, gözdağı vermek, korkutmak, kişisel ve ev ihtiyaçlarını karşılamamak.

**Cinsel Şiddet**  
Cinsel ilişki tarafların onayı esastır. İstenmeyen cinsel davranışları yapmaya zorlamak, istenmeyen şekillerde/zamanlarda cinsel bölgelere dokunmak, istenmediği halde cinsel ilişkiye zorlamak, tecavüz etmek, taciz etmek, cinsel ilişki sırasında güç kullanmak, cinsel yönelime bağlı davranışları değersizleştirmek, çocuk doğurmaya veya doğurmanaya zorlamak, aldatmak, zorla veya erken yaşta evlendirmek.

**Dijital Şiddet**  
Kişiyi sürekli mesaj göndermek, göndermesi için baskı yapmak, sürekli arayarak denetlemek, yer bildirim yapmasını istemek, sosyal paylaşım sitelerini takip etmek, dijital platform kullanıcı adı ve şifrelerini almak, gizli kameraya almak, fotoğrafını veya videosunu çekip tehdit aracı olarak kullanmak.

**#AileiçiŞiddetEson**

**ŞİDDET BİREYLERİ OLDUĞU KADAR TOPLUMLARI DA DERİNDEN ETKİLEYEN CİDDİ SONUÇLAR DOĞURMAKTADIR. SESSİZ KALMA!**

Güvenle, Güvende, Güvenli

**İR GÜVEN**

**Aile İçi Şiddete Maruz Kalıyorsanız Yalnız Değilsiniz**

**Destek için aşağıdaki tüm kurum ve kuruluşlara başvurabilirsiniz.**

**1. KOLLUK KUVVETLERİ**  
• Polis Merkezleri  
• Alo 155 Polis İmdat  
• Jandarma Karakolları  
• Alo 156 Jandarma İmdat

**2. ADLİ KURUMLAR**  
• Cumhuriyet Savcılığı/Başsavcılığı  
• Aile Mahkemeleri

**3. SAĞLIK KURULUŞLARI**  
• Birinci Basamak Sağlık Kuruluşları  
• Aile Sağlığı Merkezleri  
• Acil Servisler  
• 112 Acil Ambulans Hizmetleri

**4. SİVİL TOPLUM KURULUŞLARI**  
**Aile İçi Şiddete Son Acil Yardım Hattı**  
Tel: 0212 656 9696 - 0249 654 9696  
Web Sitesi: www.ailecisiddeteson.com

**Mor Çatı Kadın Sığınma Vakfı**  
Tel: (212) 292 52 31-32  
E-mail: morcatimorcati.org.tr  
Web Sitesi: www.morcati.org.tr

**KAMER**  
Tel: 0530 664 4410  
Web Sitesi: www.kamer.org.tr

**KAHDEM - Kadınlara Hukuki Destek Merkez Derneği Kurumsal Sitesi**  
İletişim: kahdem@gmail.com  
Web Sitesi: www.kahdem.org.tr

**Ankara Kadın Dayanışma Vakfı**  
Tel: (0312) 432 07 82 - 430 40 05  
İletişim: bilgikadindayanismavakfi.org.tr  
Web Sitesi: www.kadindayanismavakfi.org.tr

**5. BELEDİYELER**  
Belediye Müdürlükleri Kadın Danışma Merkezleri

**6. AİLE VE SOSYAL POLİTİKALAR BAKANLIĞINA BAĞLI KURUMLAR**  
**AİLE VE SOSYAL POLİTİKALAR (L) MÜDÜRLÜKLERİ (ASPB)**  
• ŞÖNİM - Şiddet Önleme ve İzleme Merkezi  
• Aile Danışma Merkezleri  
• Sosyal Hizmet Merkezleri  
• Toplum Merkezleri  
• Alo 183 - Kadın, Çocuk ve Özürlü  
• Sosyal Hizmet Danışma Hattı  
• Alo 144 - Alo Sosyal Yardım Hattı

**7. BAROLAR**  
• Kadın Hakları Merkezleri ya da Kadın Hakları Komisyonları Adli Yardım Bürosu  
• Hukuksal Danışmanlık ve Avukatlık Hizmetleri

**İR GÜVEN**

**Sabancı Üniversitesi** | **UNFPA** | **TUSİAD** | **GÜVEN**

# HUGO BOSS Textile Industries

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HUGO BOSS Textile Industries wrote the policy document titled “Regulation on the Implementation of Gender Equality Policy” in 2019. The policy document was created under the leadership of the Human Resources Department and applies to all employees. The purpose of the document is to ensure that all HUGO BOSS Textile Industries employees work in a respectful environment with the principle of equality without gender discrimination. The company communicated its policy document, which includes the company’s principles and gender equality perspective, with all the employees in training sessions on the subject.

While the main title of the policy document pertains to gender equality, the document also includes the company’s approach to domestic violence and the support it provides to its employees who are exposed to domestic violence. It should be noted that HUGO BOSS Textile Industries emphasizes in the policy document the relationship between achieving gender equality and preventing domestic violence.

HUGO BOSS Textile Industries established the “Gender Equality Committee” for the coordination of gender equality work in the company. Committee members participated in the training program which featured titles such as “Being a Woman as an Individual” and “Effective Communication” to support them in fulfilling their responsibilities.



## Procedure and Principles of the Application Mechanism

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In 2004, HUGO BOSS Textile Industries formed an organization called “Purple Umbrella”, to which employees exposed to domestic violence can apply. The purpose of Purple Umbrella is to inform employees exposed to domestic violence about the situation they experience and the mechanisms they can apply to and to enable them to access the support they need. The company carries out all these works on the basis of the principle of confidentiality.

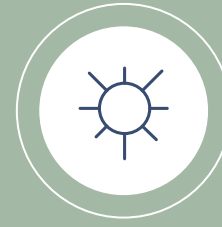


## Precautions, Supports, Sanctions

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The company acts upon its perspective for combating violence that adopts both preventive and protective approaches in cases of domestic violence. Therefore, it provides the following support to its employees who are exposed to violence:

- It undertakes to take necessary security measures, taking into account the aggrieving experiences faced by the employee who is exposed to violence.
- The company collaborates with a psychological counseling center for employees who need psychological support. The psychologists of this center work at the company on certain days of the week and provide free psychological counseling to the employees. Employees exposed to violence can also benefit from this support.
- Company lawyers provide free legal counseling to employees who are exposed to violence.
- Employees who have been subjected to violence can receive financial support from the "Aid Fund".



## Awareness Raising

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HUGO BOSS Textile Industries organize a series of awareness-raising activities, especially for the promotion of the company's policy document, which includes its corporate stance on gender equality and domestic violence. One such activity is to provide training to all employees on the basic concepts of gender equality. In addition, it organized a series of conversations where women in the company shared their personal empowerment stories. In these conversations, due attention was paid to ensuring that women can share their experiences in a safe space. The company also organizes annual seminars with the participation of experts within the scope of March 8 International Women's Day.

HUGO BOSS Textile Industries also organize activities aiming to ensure gender equality through corporate collaborations. One of the most important of these activities is the "Open Door" (TAFF) program, which has been implemented with İŞKUR (Turkish Employment Agency) since 2010. In this program, unemployed women at the age of 25-35 are given free vocational training for two months, supporting women's participation in the labor force. To date, approximately 1625 women have successfully completed the TAFF program.

HUGO BOSS Textile Industries' employees joined the UN's "16 Days of Activism" campaign, which is carried out with a different theme every year to combat gender-based violence, between November 25 to December 10, by wearing orange in 2022. The company prepared visual materials announcing that they would participate in the campaign and shared all these materials with all employees via e-mail, on in-house information boards, and on mobile applications. In addition, it has prepared an informative document that includes definitions of violence and its forms, safe steps that the person exposed to violence can take to stay away from violence, and guidance for the immediate environment of the person exposed to violence.



# Jotun Boya

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Jotun issued its “Policy for Combating Domestic Violence in the Workplace” in 2018. The aim of the policy is to raise awareness of domestic violence among employees and to provide a work environment that is egalitarian, safe, and does not tolerate any form of violence. In the policy, domestic violence is defined as any form of violence that occurs within the family or between current or former partners or spouses, regardless of whether the perpetrator and the exposed share or have shared the same residence. Human Resources Department was responsible for the preparation process of the document and is responsible for its implementation. The document was communicated to all the employees of the company.



## Procedure and Principles of the Application Mechanism

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An employee experiencing violence at Jotun can contact Human Resources. HR informs the employee about the support mechanisms inside and outside the company and directs him/her to the relevant public and non-governmental organizations in line with the needs.



## Precautions, Supports, Sanctions

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Jotun lists the forms of support it will give to its employees who are exposed to violence:

- Taking necessary precautions during commuting in personnel shuttles,
- Providing a place in the company carpark for the private vehicle of the person who was subjected to violence,
- Helping the employees exposed to violence to access the accommodation units of the companies with which Jotun collaborates,
- Advance payments to the person in line with his/her demands and needs,
- Allowing for flexible working hours so that the security risks persons face can be minimized,
- Allowing the person to take annual leave upon request or to take advance annual leave in the absence of the right to leave,
- Supporting the person who is exposed to violence in his/her applications to law enforcement.

Jotun acknowledges throughout this process that survivors of domestic violence may experience problems such as chronic absenteeism, tardiness, and poor performance at work. If the company is aware of the problems arising due to domestic violence, the company pledges to consider all the problems and act in good faith for the solution of the problems.



## Awareness Raising

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If the employee who has been subjected to violence has issued a restraining order based on Law No. 6284, s/he must submit a copy of the relevant order to HR so that the company can take necessary security measures.

HR conducts the entire application process in confidentiality, respecting the privacy of the employee exposed to violence.

If an employee uses workplace resources to commit or threatens to commit domestic violence, the company may take disciplinary action, including, but not limited to, dismissal.

Jotun, recognizing that the perpetrator may also need support and has the right to benefit from company resources, offers therapy support to the perpetrator of violence, with the consent of the person.

Jotun, in the policy document, acknowledges the importance of awareness raising in combating domestic violence and emphasizes that one of the most important resources in this combat is the trained workforce. The company developed an e-learning program for awareness raising on domestic violence and shared this program with the personnel who have an e-mail account (approximately 450 people). Besides, Jotun organizes special events on the subject on related days such as March 8 International Women's Day, November 25 International Day for the Elimination of Violence against Women, and December 10 Human Rights Day. For example, on March 8, 2022, the company organized with AÇEV the "I am Aware of Equality" seminar. In addition, it reminds its employees of the policy document at the events that take place between November 25 and December 10 every year.



# Limak Group of Companies

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Limak Group of Companies (Limak) issued its “Policy for Combating Domestic Violence” and “Procedure on Combating Domestic Violence” in 2020. Applying to the entire personnel body regardless of gender, the policy document and the procedure are developed with the aim of preventing all kinds of acts of violence, providing the necessary support to employees exposed to domestic violence, and raising the awareness of employees about violence. The policy document provides a framework for how the company addresses domestic violence and the principles it will comply with within the process. The procedure, on the other hand, includes the mechanisms to implement the basic concepts in combating domestic violence and the policy framework.

These two documents, elaborating on the company’s corporate stance on domestic violence, were shared with all employees through internal communication channels. In addition, in order to raise awareness about violence and provide information about support mechanisms, the company prepared a brochure named “Digital Screens for Combating Domestic Violence” and “Against Domestic Violence” using the contents of both documents. Information regarding the circulation of this brochure was also shared with all employees via e-mail. In addition, the policy and procedure are incorporated into the orientation process for new recruits.

Both policy and procedure emphasize that domestic violence is not related to gender differences but to gender roles and inequality of power. In addition to this apt emphasis on the source of violence, domestic violence is broadly defined in the corporate documents in such a way as to cover all kinds of violence that occur in all relationships in the past or present, regardless of whether the perpetrator and the person exposed to violence are married or live in the same household.

The procedure gives information about violence and its forms, as well as the signs of violence and how to communicate with a person who has been subjected to violence. This content, which is one of the distinguishing aspects of the procedure, is important in terms of being supportive and guiding the people close to the survivors of violence.

The Human Resources Directorate is responsible for updating, supervising, and monitoring the policy and procedure. When situations not clearly stated in the procedure occur, the decision is taken by the Chairperson of the Board/General Manager.



## Procedure and Principles of the Application Mechanism

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Limak has created a special in-house mechanism called the “Employee Support Group” to which employees who are exposed to or witness domestic violence can apply. The Employee Support Group consists of three people who have received training on domestic violence and are competent in their fields.

A Limak employee who is exposed to domestic violence can apply to the line manager or the Employee Support Group by submitting the “Notification Form for Violence and Violation of Sexual Immunity”. The person can also submit an anonymous application by sending the notification form to the Employee Support Group via the specified e-mail address or by hand in a sealed envelope. After the applicant is informed about the support mechanisms inside and outside the company, s/he is directed to the relevant authorities.

Adopting the principles of equality, diversity, and inclusiveness, Limak undertakes to carry out the entire application process on the basis of trust and solidarity. In addition, it conducts the procedure in an objective manner by taking the necessary confidentiality and security measures in order to protect the personal information of the person subjected to violence and related third parties.



## Precautions, Supports, Sanctions

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Limak takes the security measures and provides the relevant support that is listed below. In doing so, Limak seeks the consent of the employee exposed to domestic violence at every step and pays due attention to the limits of the company's involvement. After an employee, who is exposed to domestic violence and has a restraining order based on Law No. 6284, submits the relevant court decision to the company, the company takes the following security measures and more:

- Limak takes measures for the phone and e-mails of the person exposed to violence within the scope of the security plan to be implemented in order to prevent the perpetrator from stalking,
- The company devises a security plan,
- It allocates a private car park space for the employee,
- The company provides the employee with a companion while accessing shuttles or other public transportation points.
- It allows the employee to be relocated for providing a safer work environment.
- Third-party access to confidential personal information such as temporary or new addresses, bank, or health information is prevented.

Limak acts on the principle of equal opportunity with the aim of preventing any harm to the work life of the employee who is exposed to violence, hence, gives the following support to its employees to stay away from violence and its effects:

- Employees who are victims of domestic violence can call "Limak Group of Companies Domestic Violence Hotline". It provides psychological counseling and guidance on the phone 24/7 via clinical psychologists and, in addition to that, face-to-face psychological counseling and guidance when deemed necessary in special cases. It is ensured that they benefit from legal information services 24/7 through a legal expert.
- The company refers the employee to the workplace doctor when s/he needs physical health support and, in the absence of the workplace doctor, to the relevant support mechanism provided by the contracted healthcare institutions.
- If needed, the person is given advance payment or other financial support or provided with access to other resources.
- The employee who is exposed to violence is entitled to paid or unpaid leave for the requested period, flexible or part-time working or remote working if needed.
- The company pledges that the employee exposed to violence continues to take part in the performance evaluation processes and continues to benefit from the performance-based rewarding and benefits offered to all employees. It is taken into account that experience of violence may affect the employee's performance in different ways, and the performance goals and criteria that apply are to be reviewed according to a personal situation.

If a Limak employee commits domestic violence, Limak acts with the awareness that the person in question may also need support and has the right to benefit from the company's resources. Accordingly, it directs the employee in question to programs that aim to raise awareness of violence, induce a change in behavior and attitude such as anger management and stress coping. If these supports do not result in the expected effect and the person continues to perpetrate violence, the company may impose penal sanctions including the termination of the employee's employment contract.



## Awareness Raising

Aware of the fact that domestic violence is an internalized behavior, Limak gives importance to organizing awareness-raising activities to eliminate violence. In line with this goal, Limak ran two communication campaigns for its employees titled “We speak the language of domestic love” and “Love, not domestic violence”. The purpose and content of both campaigns were shared with all employees via an informative e-mail. In addition, informative visuals focusing on combating domestic violence were published on digital screens in the office.

Trainings are the other pillar of awareness-raising activities. Limak organized “Training for the Guide for Combating Domestic Violence” and “Trainer’s Training for Combatting Domestic Violence” in line with its diversity and inclusion efforts. Valuing the sustainability of these training programs, the company plans to train in-house trainers so that they can give training to the new recruits.

Within the scope of the November 25 International Day for the Elimination of Violence against Women, Limak carries out communication activities every year with the aim of raising awareness and demonstrating the company’s “zero tolerance to violence” approach.



### Kadınlara ve Kız Çocuklarına Yönelik Hiçbir Şiddet #KaranlıktaKalması

Günümüzde dünyada ve ülkemizde bireysel şiddete en fazla maruz kalan kesimin kadınlar olduğunu farkındayız. Biz de bu yıl, 25 Kasım Kadına Yönelik Şiddete Karşı Uluslararası Mücadele Günü ve 10 Aralık İnsan Hakları Günü arasında gerçekleşen 16 günlük aktivizm kampanyasına, kadınların yaşadıkları şiddet #karanlıktaKalması ile hazırladığımız iletişim çalışmalarımıza katkıda bulunuyoruz.

Uluslararası kapsamda Birleşmiş Milletler Kadın Birimi'nin (UN Women) yürüttüğü ve yakın partner şiddetine dikkat çeken #SheSaidNo kampanyasını destekliyor, kadınlara yönelik fiziksel, psikolojik, cinsel, ekonomik ve siber şiddete “hayır” diyoruz.

“Ev İçi Şiddet ile Mücadele” ve “Şiddet ve Cinsel Dokunulmazlığın İhlaline Karşı Sıfır Tolerans” politikalarımızla; şiddetin her türünün karşısında duruyor, “Kadına Yönelik Şiddete Sıfır Tolerans” diyerek, kadınların iş hayatından, gündelik yaşamda karşılaştığı şiddete kadar her alanda somut adımlar atan bir duruş sergilemeye devam ediyoruz.



www.limak.com.tr

# Mondelez Turkey (Kent Gıda)

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Mondelez Turkey (Mondelez) issued the “Policy for Combating Domestic Violence”, the preparations of which started in 2021, and in 2022. Based on the principle of “creating a decent work and working environment”, the aim of the policy is to raise the awareness of employees about domestic violence and to lay out the support given to employees to are exposed to violence.

The policy document, applying to all Mondelez employees, includes the definitions of violence and its forms along with the methods and procedures used to support company employees who are exposed to or at risk of domestic violence.

In the policy, domestic violence is defined as any kind of violence that occurs between persons considered to be family members, regardless of whether they share the same household.

The company announced the adoption of the policy document to the whole country with a livestreamed launch attended by the general manager.

All Mondelez units are obliged to implement this procedure. The Human Resources Department is responsible for providing the support pledged in the policy.



## Procedure and Principles of the Application Mechanism

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A Mondeley employee who is exposed to violence can directly apply to their manager or the human resources department. Also, the employee can call the Domestic Violence Hotline operated by TKDF. The company informs the employee exposed to domestic violence about the application channels inside and outside the company and directs them to the relevant public institutions or nongovernmental organizations in line with their needs.

Mondelez conducts the entire application process in confidentiality, with the consent of the employee exposed to domestic violence and respecting their privacy.

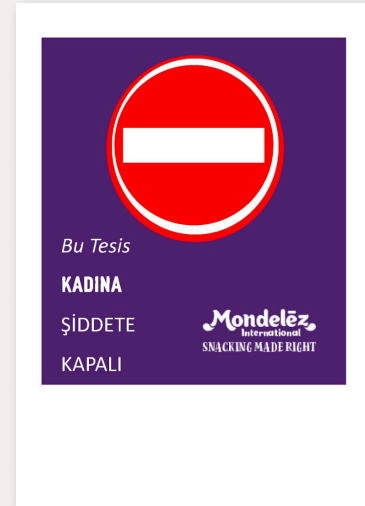


## Precautions, Supports, Sanctions

Mondelez recognizes that the physical and psychological consequences of domestic violence will have adverse effects on a person's work life. Therefore, it has committed to take affirmative action for survivors of domestic violence in practices such as recruitment, dismissal, performance assessment, or employee privileges. In parallel, the company states that the performance assessment process shall take into account the subjective conditions that survivors of domestic violence might him/herself in.

The followings are the support provided and security measures by the company in an effort to help the employees to stay away from violence and its adverse effects:

- The employee is offered three sessions of free psychological support by Magellan, Mondelez's business partner.
- If the employee who is exposed to violence requests a change in the transportation route and shuttles, Human Resources Department can evaluate the request.
- The perpetrator can be prevented from accessing the person exposed to violence in the workplace.
- When needed and in accordance with the request and consent of the employee in question, Human Resources can consider relocating the working area of the domestic violence survivor.



- The company can rearrange the payment method for the employee's salary and other benefits in order to prevent the perpetrator from accessing the bank account information.

Besides the abovementioned support provided directly within the company, employees who are exposed to or at risk of domestic violence can receive free legal and psychological support from TKDF within the scope of the protocol signed with the Federation of Women's Associations of Turkey (TKDF).

If the perpetrator of domestic violence is a Mondelez employee, Mondelez may refer both the perpetrator and the exposed to psychological support with their consent. The company states that, depending on the severity of the act of violence, legal actions can be taken including the use of annual paid leave and the termination of the employment contract with valid and justified reasons. If the employee uses workplace resources in perpetrating or threatening to perpetrate domestic violence, Mondelez commits to undertake disciplinary processes, including (but not limited to) dismissal.



## Awareness Raising

Mondelez, with the support of experts, gives trainers training on domestic violence and gender equality. There is a remarkable interest in these trainings, in which the employees participate voluntarily. Owing to this interest, the company aims to complete the awareness raising trainings to be given by the in-house trainers to all white- and blue-collar employees in 2023. In addition, training on gender equality and domestic violence will be included in the orientation process. Thus, it is aimed at new employees to learn the corporate stance and raise their awareness on the subject. Mondelez upholds these awareness-raising efforts with visuals that include warnings such as “This facility is closed to violence against women”.

Apart from the trainings, the company plans to raise the awareness of the employees by organizing events with the participation of expert speakers.





## Seger Horns Inc.

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Seger Horns (Seger) published its policy document titled “The Equality Policy” in 2018. The aim of the policy is to raise awareness among the employee body on gender equality and to build an egalitarian and solidaristic workplace culture. With this document, Seger has declared that it has committed to non-discrimination within the organization, pledged to ensure gender equality in working life, object to all kinds of violence, and support the employees who are exposed to domestic violence.

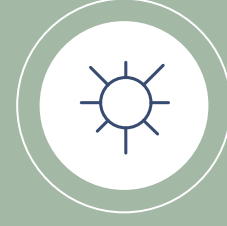
The policy is integrated into the company’s internal regulations. Within the scope of the policy, every new employee is obliged to attend a one-hour orientation program on gender.



## Precautions, Supports, Sanctions

Seger signed a protocol with Mor Salkim Solidarity Association in 2017 to support the employees who are exposed to domestic violence. Within the scope of this protocol, employees who are exposed to domestic violence can receive legal, psychological, and financial 24/7 free support from the Violence Hotline operated by Mor Salkim. The protocol enables Seger to request an annual report from the association detailing how many people within the company called the Violence Hotline, for what reasons, and what kinds of support they requested.

Within the scope of Seger's Social Sustainability and Ethics Policy, employees who are exposed to violence and mobbing can also reach out to the ethics hotline and receive information and guidance.



## Awareness Raising

Seger organizes numerous awareness-raising activities on gender equality and domestic violence. These events that have been held so far are as follows:

- Employees were given out magnets with the phone numbers of the institutions that can be applied to in cases of domestic violence.
- A campaign named "Our Voice is Our Equality" was organized with the aim of identifying and transforming sexist expressions in the language. With this campaign, the words that need to be changed for a more egalitarian language were spotted and posted in the common areas in the company workplace.
- Every year, orange badges are distributed as part of the November 25 International Day for the Elimination of Violence against Women, table mats are prepared and placed on trays, and educational videos about violence are circulated.

Besides the activities listed above, Seger organizes events on domestic violence and gender equality with the Bursa Platform for Women's Empowerment, of which Seger is the chair of the Activities Committee. One such event is the seminar series organized under the name of "Our Strength is Our Equality".

Another one, which is still in the process of planning, aims at a regular exchange of information and experience among 33 private companies.



# Tekfen Holding Co., Inc

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Tekfen Holding Co., Inc (Tekfen Holding) announced its policy titled “Policy for Combating Domestic Violence” in 2020 as a result of a project carried out by a team of 15 company representatives under the leadership of the sustainability department. In 2021, the company issued the “Guide to Combating Domestic Violence against Women”, which takes the policy as its foundation.

The Guide to Combating Domestic Violence against Women defines more comprehensively the perspective laid out in the policy document and details the concrete steps to be taken in the struggle against violence against women. The guide, as well as its conceptual framework and perspective for combating violence, refers to the Istanbul Convention, the most advanced and comprehensive international legal document in the struggle against violence against women. In line with this reference, Tekfen Holding defines domestic violence against women as an assault on human dignity and a violation of the most basic human rights. In the guide, one can see how the holistic perspective embraced by the Istanbul Convention on combating violence against women is reflected. The guide, prepared for all employees with the aim of building an egalitarian, safe, and solidaristic work life where no form of violence is tolerated, undertakes to organize events for raising awareness and to support women to get away from violence and its effects.

The guide which is prepared with the awareness that violence against women can affect all women regardless of education and income level, essentially covers Tekfen Holding and companies within the Tekfen Group, their branches and subsidiaries, senior executives, board members, and employees, it nonetheless serves as a guide for all subcontractors, suppliers, business partners, and anyone associated with Tekfen Holding. Subcontractors cannot benefit from all of the support Tekfen Holding provide; however, Tekfen Holding encourages these companies by guiding them to develop similar policies. Tekfen Holding employees, subcontractors, and their immediate family members can also benefit from the psychological and legal support line that Tekfen Holding provides, available 24 hours a day, 7 days a week.

The company established a Domestic Violence Committee, consisting of volunteers and team members among Tekfen Group employees who participated in the Business Against Domestic Violence Project. The committee is in charge of organizing awareness-raising activities, primarily promoting the guide to employees and updating it when necessary; coordinating the application process in cases of violence within the company; and developing support mechanisms with suggestions. Human Resources is responsible for the implementation of the protective measures for survivors of violence and for the prevention of violence, namely the issues pledged in the guide. A distinctive feature of the guide lies in the emphasis that not only managers or the relevant unit but also all employees are responsible for preventing violence and supporting those who are exposed to violence.



## Procedure and Principles of the Application Mechanism

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Tekfen Holding created special application mechanisms that will contribute to the mainstreaming and sustainability of the struggle against domestic violence. These channels are the Domestic Violence Committee, which is responsible for the coordination of support to the employees who are exposed to violence, and the Domestic Violence Hotline, which provides 24/7 service. The presence of a specialized unit and a hotline is not only in accord with international norms and standards, especially the Istanbul Convention, but it is also an exemplary feature of Tekfen Holding's approach to combating domestic violence.

A Tekfen Holding's employee who is exposed to domestic violence can reach out to the Tekfen Holding Domestic Violence Hotline, send an email to the Domestic Violence Committee or the Ethics Coordinator, or make a face-to-face application to these units. The applicant is provided with the necessary information about the support and resources within and outside the company and various options are offered.



## Precautions, Supports, Sanctions

Tekfen Holding offers comprehensive support to its employees who are exposed to domestic violence under the main headings of Psychological Support and Counseling, Physical Security Support, Financial Support, and Professional Performance Support.

- 24/7 psychological and legal support and guidance from the Domestic Violence Hotline,
- Psychological counseling support with an option of the face-to-face meeting offered,
- If needed, an advance with the upper limit of one month's salary to be given once a year and to be collected within 6 months,
- Flexible working opportunities,
- Up to 10 days of paid administrative leave per year,
- Reviewing the performance criteria for the employee in question.

In cases where there is a security risk, the company offers the following support to the person exposed to violence:

- Allocating a place in the company carpark for the employee who has a personal vehicle,
- Changing business phone number and e-mail address,
- Preventing the perpetrator of violence from reaching the employee who is exposed to violence through the company's central office.



- Depositing the employee's salary to another bank account number that s/he will determine,
- Preventing the perpetrator from entering the office space where the employee who is exposed to violence works.

Along with the measures and supports listed above, Tekfen Holding also offers its employees another distinctive support. The company grants employees, who want to stand in solidarity with their colleague who is exposed to violence, the right to paid administrative leave for up to two days so that the employee in question can support his/her friend in hospital, court, or childcare.

Tekfen Holding acknowledges those Tekfen Holding employees, who perpetrate violence or threaten to do so, also need help and directs them or their relatives to therapy through the Domestic Violence Hotline, after obtaining their consent. In cases where an employee commits violence by using company resources, Tekfen Holding takes necessary disciplinary actions. If the aforementioned acts of the perpetrator are legally established, the employment contract may be terminated unilaterally, with the company undertaking relevant responsibilities and compensation.



## Awareness Raising

In the guide, Tekfen Holding has committed to organizing activities to raise employees' awareness of violence. To that end, the company first of all printed posters to promote the policy and the guide, and also included news about these documents in the digitally prepared T-bulletins so that company employees could follow the news within the group. In addition, the policy and guide were printed and distributed to all workplaces. Both documents are available on the company website. Another awareness-raising effort is that Tekfen Holding prepared ads titled "We are with you" in order to make survivors of violence feel that they are not alone and to encourage them to call the Domestic Violence Hotline.



### 3. TANIMLAR ve AÇIKLAMALAR

Rehberde yer alan kavramlar genel anlamlarıyla değil, bu rehberin amacıyla sınırlı olarak ve büyük ölçüde İstanbul Sözleşmesi'nden faydalanarak tanımlanmıştır.

#### **İstanbul Sözleşmesi**

Kadına yönelik şiddet ve aile içi şiddetin önlenmesi konusunda ülkemizin ilk imzacı olarak taraf olduğu 1 Ağustos 2014 tarihinde yürürlüğe giren, "Kadınlara Yönelik Şiddet ve Aile İçi Şiddetin Önlenmesi ve Bunlarla Mücadeleye İlişkin Avrupa Konseyi Sözleşmesi"dir.



**Kadına Yönelik Aile İçi Şiddet, eylemi gerçekleştirenle maruz kalanın biyolojik, hukuki veya ailevi bağı olup olmadığına, aynı ikameti paylaşıp paylaşmadığına bakılmaz. Bu şiddet, aile içinde veya biriminde, mevcut ya da daha önceki eşler ya da birlikte yaşayan bireyler arasında yaşanır ve kadını hedefler. Fiziksel, cinsel, psikolojik ve ekonomik şiddet eylemlerini kapsar.**

# Turcas Petrol

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Turcas Petrol issued its “Zero Tolerance to Domestic Violence Policy” in 2018. Centered on the fact that domestic violence as a social problem is experienced in walks of society, the aim of the policy is to raise awareness among employees on zero tolerance to all types of domestic violence and on the occurrence of violence as well as to support employees who have been exposed to or at-risk domestic violence.

While defining domestic violence, the policy does not make a distinction about whether the perpetrator and the person exposed to violence share or have shared the same household. Domestic violence is defined in a way to include any act of violence that occurs between current or former spouses or partners living together.

The Human Resources Directorate and Corporate Communications & Marketing Department are responsible for the implementation of the policy.



## Procedure and Principles of the Application Mechanism

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An employee who is exposed to domestic violence can apply directly to Human Resources. HR directs the employee to the relevant public institutions and non-governmental organizations in line with their needs and coordinates the security measures that can be taken and the support to be provided within the company

The company carries out this entire process in confidentiality without violating the privacy of the applicant; that is to say, it does not share personal information with third parties without the consent of the applicant.





## Precautions, Supports, Sanctions

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In 2018, Turcas Petrol launched the “Employee Support Program”, which covers all employees and their first-degree relatives. This program offers psychological (24/7 online, 2 sessions face-to-face) and legal support to employees who are exposed to any form of violence. In addition, the company also provides the supports listed below so that the employee who is exposed to violence can stay away from the violent environment:

- Allowing the employee to take annual leave or advance annual leave in the absence of annual leave,
- When requested by the employee who is exposed to violence and approved by the senior management, advance salary can be paid to the employee,
- Upon the request of the employee and approval of the management, offering flexible working hours for a certain period of time,
- Informing the Aksoy Plaza security team and the company for them to take necessary precautions, if the domestic violence survivor is at risk of severe physical violence,
- Upon the request of the employee and the approval of the management, the applicant can be accompanied by law enforcement in the application process, in cases where the person is proved to have been exposed to physical violence.

The employee who has been exposed to violence must submit a copy of the restraining order issued within the scope of Law No. 6284 to the Human Resources Department for the security measures can be taken.

If the perpetrator is a Turcas Petrol employee, the company has the right to initiate disciplinary actions and impose all kinds of sanctions in accordance with the relevant legislation, including dismissal. If the employee uses workplace resources (phone, e-mail, company vehicle, etc.) while committing the act of physical violence, the company may submit the recordings to the court when necessary.



## Awareness Raising

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Turcas Petrol reinforces its “zero tolerance to violence” approach with the trainings on gender equality as well as with the immediate support given to the employees who are exposed to violence. So far, 70 people have attended these trainings.

Turcas Petrol also gives importance to cooperation with civil society in combating domestic violence. In this respect, the company, with the support of NGOs, organized seminars on Women’s Empowerment Principles (WEPs), Gender Equality, and the BADV Project. Besides, it has held meetings/seminars for employees with the cooperation of Yanındayız Association, SEBUKA, and Mother Child Education Foundation (AÇEV). Within the scope of the November 25 International Day for the Elimination of Violence Against Women and Solidarity, Turcas Petrol supported the UN Women campaign “Light a Firefly and Light the Dark”.

# Vodafone Turkey

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Vodafone Turkey created and started to implement the policy document titled “Procedure for Combating Domestic Violence” in March 2019. Vodafone Turkey is the first Vodafone branch to issue such a procedure in all countries where Vodafone operates. The procedure elaborates on how to recognize symptoms of domestic violence, how to support the employee who is exposed to violence, and how to direct the employee to the appropriate institutions.

Initiated with the guidance of Vodafone Group, the procedure was prepared with the cooperation of the Vodafone Turkey Human Resources, Legal Department, Sustainability Department, Public Relations, Brand Department, and Vodafone Turkey Foundation team. The policy aims to raise awareness of domestic violence and to create an egalitarian and safe work environment that adopts the zero-tolerance principle to violence so that the employees who are exposed to violence will be able to speak and receive support with confidence and confidentiality.

The procedure covers all Vodafone Turkey companies including VMOL and all Vodafone Turkey employees.

HR Director and CEO are in charge of the procedure. The Human Resources Department is responsible for executing the procedure, monitoring, and updating its implementation.



## Procedure and Principles of the Application Mechanism

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A Vodafone Turkey employee who is exposed to violence can apply to the manager of the department, corporate security manager, and Human Resources department. In addition, s/he can call Vodafone Turkey Employee Support Program LEAP Domestic Violence Hotline or apply via e-mail at @vodafone.com.

The company conducts the entire application process by respecting the privacy of its employees who are exposed to or at risk of violence.



## Precautions, Supports, Sanctions

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Vodafone Turkey can take the following measures to ensure the safety of the employee exposed to violence:

- Changing working hours and/or location, if possible,
- Changing the work phone number and/or e-mail address and preventing the perpetrator from reaching out to the employee exposed to violence through the central office,
- Changing the company shuttles and/or plate numbers if applicable,
- Allocating a slot for private vehicles in the company carpark.

The company may take other security measures if deemed necessary. If the workplace address is determined as a protected area in the restraining order of the employee within the scope of Law No. 6284, the employee must submit a copy of the court decision to the Corporate Security Directorate and inform Human Resources.

Vodafone Turkey also offers the following support to its employees who are exposed to violence:

- Paid administrative leave up to 10 working days when needed, excluding the right to annual leave,
- Unlimited legal and psychological counseling with the employee support program LEAP Domestic Violence Hotline and 4-session face-to-face psychological counseling,

- Upon request due to the distress experienced by the person exposed to violence, advance with the upper limit of one net salary, to be given not more than once a year.

Vodafone Turkey has another distinctive support for its employees who are exposed to violence. The company grants its employees, who want to be in solidarity with their colleague who is exposed to violence, the right to paid administrative leave for up to two days so that they can be with their friend in hospital, court or childcare processes. Additionally, an employee, who comes to know that a colleague has been exposed to domestic violence, can benefit from the Guide for Domestic Violence in the Workplace. The guide not only raises awareness about domestic violence but also encourages taking action and contains key information on how to give guidance.

Another prominent effort by Vodafone Turkey is the Red Light Application (Kırmızı Işık), the first of its kind in Turkey. The application is developed for all women who are exposed to violence and are concerned about their safety. The Red-Light Application, launched by Vodafone Turkey in 2014 and stemmed from the company's vision to use the transformative power of technology for the common good of humanity, enables women who are exposed to violence to reach out to their friends and relatives via phone and send emergency SMS with a single click. In practice, Alo 183, 155 Police, 156 Gendarmerie, and TKDF Domestic Violence Emergency Helpline are available for a click to call. In addition, the addresses of the nearest ŞÖNİMs (Ministry of Family and Social Services Violence Prevention and Monitoring Center) and relevant institutions that can be applied are marked on the map. The application also includes information on what to do when exposed to violence, gender equality training videos, and tests aimed at raising awareness of violence. Application users can easily access the answers to their questions about violence thanks to the newly added digital assistant called "Light". There are three language options in the app: Turkish, Arabic, and English.



## Awareness Raising

Vodafone Turkey deems awareness activities to be a crucial pillar of the combat against violence. An important indicator of this approach is the training program called “Vodafone Domestic Violence Awareness Raising Training”. The company aims to have all employees participate in this training, which so far 70% of the employees have completed.

Another important company activity for raising awareness is the publication of the “Toolkit on domestic violence and abuse at work” which was written by Dr. Jane Pillinger, an expert on gender equality. The toolkit can be used by all managers and employees and was made available to all stakeholders on the company website. Designed as an open-source guide with the purpose of raising awareness about domestic violence, the toolkit grippingly details the definitions of violence, the effects of violence on the workplace, and what employees and managers can do to minimize these effects through case studies.

Another leg of the company’s awareness-raising efforts includes interviews with experts on domestic violence and gender equality. Until now, events organized with speakers from UNFPA, Sabancı University, and Istanbul Bar Association.

Vodafone Turkey also organizes awareness-raising activities in cooperation with the Federation of Women’s Associations of Turkey (TKDF). As part of this cooperation, TKDF brochures on domestic violence were distributed to the company offices in different cities.



Aile içi şiddet, yakın ilişkideki kişiler arasında meydana gelen şiddettir, aynı evde yaşama şartı aranmaz.

### Fiziksel Şiddet

İtme, vurma, vurmak üzere el kaldırma, herhangi bir madde fırlatma, tehdit etme ve yaralama gibi davranışlardır. İz bırakmasa da şiddet kapsamındadır.

### Cinsel Şiddet

Bir kişinin cinsel içerikli taciz, hakaret veya saldırıya maruz kalması, psikolojik baskı veya tehdit altında sözlü, yazılı veya sanal ortamda olmasından bağımsız cinsel ilişkiye zorlanmasıdır.

### Psikolojik Şiddet

Sistematically olarak duygusal veya psikolojik baskı, sözlü taciz, başkaları önünde aşağılama, küçümseme, mağdurun giyimini, hareketlerini, ilişkilerini denetleme, sınırlama, yakınları ve varsa çocukları üzerinden tehdit etme gibi davranışlardır.

### Ekonomik Şiddet

Ekonomik kararlarda sistematically bir şekilde baskılama, hareket alanının sınırlandırılması, gelirin kontrol edilmesi, elinden alınması, mallarına zarar verme veya varlıklarına el koyulması gibi davranışlardır.

### Siber Şiddet

E-posta, metin mesajları, telefon mesajları vb. yoluyla gerçekleştirilen, kontrol, tehdit ve takip.

# Yeşim Group Almaxtex

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Yeşim Group Almaxtex issued its “Gender Equality Policy” in 2016. In 2022, the company revised and updated the document in line with the ILO Violence and Harassment Convention No. 190. The policy document was written by the “Gender Equality Committee”, which consists of the senior managers of each unit and the union representative, with an aim to coordinate the work on gender equality within the company. The committee is also responsible for implementing the policy and organizing related activities.

In the policy document, Yeşim Group Almaxtex undertakes to prevent gender inequalities, to not discriminate, and to guide and/or provide direct support to employees who are exposed to domestic violence with the aim of helping them to build a life free from violence. One of the prominent features of the policy document lies in its effort to make visible the connections between inequality, discrimination, and violence as well as the common nature of the actions to be taken against them.

The policy covers all employees, interns, and subcontractors working in the Yeşim Group Almaxtex factory.

The adoption of the policy was shared with all employees and the public, along with the CEO’s message. In addition, the policy is periodically shared in the gender equality trainings that are part of the on-the-job trainings and in the reminder, trainings given every two years. Since 2016, more than 3000 employees have received 9042 hours of training on the subject.



## Procedure and Principles of the Application Mechanism

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A Yeşim Group Almaxtex employee who is exposed to violence can apply to Human Resources. HR directs the applicant to non-governmental organizations, law enforcement, and other government agencies that are experts in the field, based on their needs.



## Precautions, Supports, Sanctions

Yeşim Group Almaxtex support its employee who is exposed to domestic violence mainly by directing them to institutions from which they can receive information and support. In addition, the company recognizes that an employee who is exposed to violence may experience performance problems such as absenteeism, tardiness, low production, and pledges to try to find a solution for the benefit of the employee in question.

In 2016, Yeşim Group Almaxtex signed a protocol with Mor Salkım Women's Solidarity Association within the scope of the "Equality at Home and Work" project, which the company developed in an effort to create a work culture that does not tolerate violence against women. This protocol enables Yeşim Group Almaxtex employees who are exposed to violence to benefit from the violence hotline that provides support on a 7/24 basis, the counseling center, and psychological and legal support of the association.



## Awareness Raising

Yeşim Group Almaxtex organizes a wide range of activities to raise awareness of gender equality and domestic violence. These activities are grounded on three pillars: the first one pertains to trainings, the second one is the production and dissemination of written and visual materials, and the third one is collaborations with non-governmental organizations or stakeholders in the sector.

The trainings provided by the company for all its employees are as follows:

- Yeşim Academy organizes an annual training program called "Parenting School" for parents with children at the age of kindergarten. The program includes gender equality, communication for the family, and communication with the child.
- "Equality in Language and Communication" training covers gender equality.
- New recruits are given trainings called "Communication for Social Compliance" about discrimination in the workplace, gender, and prevention of violence in the workplace.
- "Training on Discrimination and Gender Equality" is organized especially for employees who work in the enterprise. The training consists of a three-hour seminar designed for blue- and white-collar employees and a full-day workshop for foremen and forewomen. Within the scope





of this program, 10 training workshops and 15 seminars were held and a total of 1500 employees participated in the training.

- The senior management team attended information and evaluation meetings where communication techniques with employees exposed to domestic violence are addressed.
- Yeşim Group Almaxtex created a training team of 14 people (9 women and 5 men) following the trainer's training on gender equality.
- A meeting on gender equality was held with managers in subcontractor companies, and gender training was organized for managers in a pilot subcontractor company.

Gender equality-related activities organized and written, and visual materials produced by Yeşim Textile are as follows:

- Business cards were prepared to contain the contact information of institutions from which to receive support when exposed to domestic violence and distributed to all female employees.
- A copy of the policy document was added to the cloth bags given as a gift to all employees on March 8, 2022.
- As part of the November 25 International Day for the Elimination of Violence Against Women, Yeşim Group Almaxtex organized an informative event with women in Karapınar Neighborhood.
- An online event on how to approach a person who has been subjected to violence and a casestudy
- workshop for team leaders on this subject was organized.
- In an online event titled Cycle of Violence, the stages of violence (the escalation of tension, the stage of violence where the physical violence occurs, and the honeymoon stage where the perpetrator expresses regret and asks for forgiveness) and the behavior of the perpetrator were addressed.

The following are Yeşim Group Almaxtex's collaborations in the field of gender equality:

- Mor Salkım Women's Solidarity Association stand was opened in the company workplace, and employees were informed about the support provided by the association, especially the violence hotline providing 24/7 support.
- As a result of the collaboration with Vodafone Turkey, the Red-Light Application developed by Vodafone Turkey for all women who are exposed to violence and who are concerned about their safety was introduced to the employees.
- Yeşim Group Almaxtex, in cooperation with the Uludağ Soroptimist Association, has been carrying out the World of the Butterfly Project in order to raise awareness of women on issues such as selfimprovement, family and children, and legal rights.
- Yeşim Group Almaxtex also leads the activities on gender equality carried out by the Global Compact Turkey and UN Women, e.g., Bursa Platform for Women's Empowerment.



# Zorlu Holding

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Zorlu Holding issued its policy document titled “We Are Always with You Against Violence: Domestic Violence Prevention Policy” in 2020. The document is the result of a joint work of the Legal and Ethics departments. Covering all employees and their children, the policy was prepared to identify the principles and sanctions for creating an egalitarian and safe work environment that is not tolerant of any form of violence.

The policy document defines violence and forms of violence and gives information about the internal and external application mechanisms that employees and their children can resort to when exposed to violence and about how the application process within the company works.

The news that Zorlu Holding adopted the policy document and the policy document itself was shared with all employees via e-mail. Subsequently, a video and a brochure titled “We Are Always with You Against Violence”, which promotes the policy document and its content, were shared with all employees and the public. Quotations from the policy document were put on the announcement screens in all offices, facilities, and factories. All units affiliated with Zorlu Holding are responsible for the implementation of the policy.

The Human Resources Group Directorate is responsible for the execution, monitoring, and updating of the policy.



## Procedure and Principles of the Application Mechanism

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The policy document details the methods and practices to be followed in the event that an employee or his/her child is exposed to domestic violence. An employee who is exposed to violence can apply directly to the line manager or to the Human Resources Department. In addition, s/he can call the company's Ethics Reporting line or send an e-mail to @zorlu.com to get information about support mechanisms. Company employees can also call the Domestic Violence Helpline within the scope of the protocol signed with the TKDF. The units responsible for domestic violence application inform the employee who is exposed to violence about the support within and outside the company and refer the person to the relevant public or non-governmental organizations when necessary.

The policy commits to carry out the entire application process with the consent of the applicant, on the basis of trust and confidentiality principles.



## Precautions, Supports, Sanctions

Zorlu Holding commits in its policy document to establish support mechanisms for its employees and their children who are exposed to domestic violence and to effectively conduct an investigation, monitoring, and implementation mechanisms. Upon request of the employee exposed to domestic violence, Zorlu Holding devices a security plan with the employee and takes necessary precautions to implement the plan. After the employee who has been exposed to violence gives a copy of the restraining order taken within the scope of Law No. 6284 and the necessary information about the perpetrator, the holding may take the following security measures in line with the employee's needs:

- The route and transportation vehicles that the employee uses can be changed.
- Access of the perpetrator to the one who is exposed to violence at work or during the commute may be prevented.
- When necessary, security guards can accompany the exposed to his/her car and/or public transportation.
- When necessary, the working area of the one who is exposed to violence exposed can be relocated to a safe place with his/her request and consent.
- The method of payment of salary and other benefits can be changed in line with the needs of the employee.
- Subcontractors can be encouraged to take necessary measures; the security

subcontractor may receive awareness-raising training on violence; and domestic violence can be added to the security plan.

Zorlu Holding offers the following support to its employees who are exposed to domestic violence:

- It allows the employee to work flexibly, part-time, or remotely when needed.
- It offers psychological support to the employee from the "We Are Well Together" platform or a specialized psychologist outside the company.
- It offers a financial support package in line with the employee's needs.
- The legal department or the law firm, if applicable, can direct the employee from whom to get support.

If the perpetrator of domestic violence is a Zorlu Holding employee, psychological support can be provided with the consent of the person. If the perpetrator and the exposed are both company employees and if they are working in the same workplace, the workplace can be changed in line with the request of the employee who has been exposed to violence. The company may take the necessary legal actions against the employee who commits domestic violence. Depending on the severity of the act of violence, these sanctions can amount to terminating the employment contract with valid or just cause.

**Haklarında mahkemeye verilmiş geçici yasa da kalıcı koruma kararları olan bir çalışan, çalıştığı şirketin güvenliğine dilekçe ve mahkeme kararının bir kopyasını ile birlikte istisnaya ait gerekli bilgileri verdiği takdirde İnsan Kaynakları departmanlarımız şiddete maruz kalan çalışanımızın güvenliğini sağlamak amacıyla:**

- 1 İş yerine ulaşım güzergâhı ve araçlarını değiştirebilir.
- 2 Şiddet uygulayanın, şiddete maruz kalan çalışanımız iş yerinde veya işe ulaşım sırasında erişimini engelleyebilir.
- 3 Güvenlik görevlerinin gerekli durumlarda şiddete maruz kalan çalışanımıza arabasına veya toplu ulaşım aracına kadar eşlik etmesini sağlayabilir.
- 4 Şiddete maruz kalan çalışanımız talebiyle çalışma alanına güvenli bir noktaya taşıyabilir.
- 5 Masaj ve spa haklarıyla ilgili ödeme bilgileri ve sekinli, şiddet uygulayanın erişimini engellemek amacıyla şiddete maruz kalan çalışanımız parçama uygun olarak yeniden düzenleyebilir.
- 6 Alt işverenler tarafından da gerekli tedbirlerin alınması, özellikle güvenliği sağlayacak işverenler şiddet konusunda farkındalık eğitimi almaya ve güvenlik planına bu konular da dâhil edilmesini sağlayabilir.
- 7 Şiddete maruz kalan çalışanımız, şirket içinde uygulanacak performans kriterlerini yeniden belirleyebilir.

**8** Telefon, e-posta, şirket aracı gibi iş yeri kaynaklarını kullanarak şiddet uygulayana tehditlerde bulunan çalışanımızla şiddete maruz kalan çalışanımız aynı iş yerinde çalışıyorsa; her iki taraf da rıza gösterdikleri takdirde psikolojik danışmanlık hizmetleri sürecine yönlendirilir. Şiddet gören iş yeri, talebi ve rızası doğrultusunda değiştirilebilir, şiddet uygulayan hakkında da ayıklama yapılabilir. Şiddet, iş sözleşmesini feshetmeye dâhil olmak üzere duruma uygun gerekli hukuki aksiyonları alabilir.

**Eğer şiddetin herhangi bir türüne maruz kalıyorsanız veya bir çalışma arkadaşınıza şiddet uyguladığını yemelik gözlemlerinizi buluyorsanız durumu ivedilikle İnsan Kaynakları departmanına aktarmanızı öneriyoruz. Unutmayın, Eşit Bİ Hayat için:**

**#ŞiddeteKarşıHepYanındayız**

**Eşit Bİ hayat**

**Şiddete karşı hep yanındayız**

**Akilli Hayat 2030**

**ZORLU**



## Awareness Raising

Zorlu Holding states in its policy document to carry awareness-raising activities about domestic violence as part of combatting violence. To that end, it has organized various activities, especially for the dissemination of the policy document. The following are the activities carried out by the company:

- An informative movie was shot in order to raise awareness about violence and forms of violence in society and to inform people who are exposed to violence about the application channels. In addition to different digital channels, the movie was promoted in all Zorlu Group Companies, facilities, suppliers, and stores as well as on billboards at different locations. In addition, a longer version of the movie was produced solely for dissemination within the company. This version, which also addresses the internal application mechanisms of the company, is used as an in-house training material.
- Every year, as part of the November 25 International Day for the Elimination of Violence Against Women, Zorlu Holding organizes events with the participation of a psychologist specialized in the forms and effects of violence and ways to avoid it. 350 employees participated in the 2022 event.
- In 2021 and 2022, Zorlu Holding organized a communication campaign carrying the message, "This is Not Love". The purpose of the campaign was to subvert the dominant discourses in society that legitimize forms

of violence under the guise that violent behaviors and attitudes are a display of "love". The visuals prepared for the campaign were distributed to all Zorlu Group Companies, facilities, suppliers, and stores and publicized in different digital channels and on billboards in different locations. With the external communication efforts, the campaign reached out to 5 million people and the campaign video was watched by a total of 1.3 million people and viewed by 6 million people.

Zorlu Holding also organizes awareness-raising activities within the scope of the protocol signed with the Federation of Women's Associations of Turkey (TKDF). One such activity is the production of written and visual materials to promote TDKF's Domestic Violence Helpline among employees. In order to encourage employees exposed to violence to share their experiences, stickers with the number of the helpline were put on the walls of the toilets and changing rooms. Within the scope of this, Zorlu Holding also organized trainers' trainings on domestic violence for employees in human resources units. It is expected that the employees (trainers) who receive the trainer training will start giving training as soon as possible.



