

AKBANK T.A.Ş.

ZERO

TOLERANCE

FOR VIOLENCE

POLICY

## Table of Contents

Purpose .....	3
Scope .....	3
Responsibilities .....	3
Reference Sources .....	4
Factors That Undermine Safety .....	4
Policies Supporting Safety at Home .....	7
Policies Supporting Safety at Work .....	9
Review of Reports .....	11
Awareness and Training .....	12
Support Channels .....	14
External Support Channels .....	14
Internal Support Channels .....	14

# Organizational Development

## > Purpose

Our bank guarantees the equality of opportunity for our employees and partners within the framework of our sustainability vision and strategies, and the implementation of policies that raise and maintain awareness of an inclusive corporate culture.

In parallel to diversity, equity and inclusion approach, our Bank undertakes that it is important for a person to feel safe at home and at work and it stands against all types of violence and abuse, the most critical element damaging trust. It is the bank and leaders of Akbank that are primarily responsible for all types of violence and abuse.

In order to create a safe and supportive working environment for all our employees, we have set out the principles and approaches in this policy document to prevent any kind of violence and the steps to be taken if and when faced with such behavior, towards which we will show zero-tolerance.

## > Scope

Processes, sanctions and support mechanisms specified in this document apply to all employees of Akbank and its affiliates. If the person using violence is an Akbank employee, the person exposed to violence is covered by processes specified in this document even if such person is not an Akbank employee.

Akbank, leaders of Akbank and all Akbank employees are obliged to adhere to these principles and elements contained in this policy. Human and Culture Business division is responsible for implementation, monitoring, evaluation and updating of this Policy document. Accordingly, implementing all projects related to the subject matter including awareness and training efforts on violence, building necessary collaborations to that end and assuring sustainability of works in this regard within the organization are among authorities and responsibilities of Human and Culture team.

## > Responsibilities

**Prepared by:** Organizational Development Department

**Opinion Provided by:** Department of Investor Relations and Sustainability, Compliance Unit, Internal Control Unit, Inspection Board Unit, Legal Consultancy Department

**Approved by:** Board of Directors

**Published by:** Organizational Development Department

**Users:** Entire Bank and affiliate employees

## > Reference Sources

Zero Tolerance for violence policy has been prepared based on relevant bank policies and principles, legal regulations and references published. Our bank guarantees the equality of opportunity for our employees and partners within the framework of our by international organizations.

### Our Bank's policy and implementation principles

- Akbank Sustainability Strategy
- Corporate Governance Principles
- Human Rights Policy
- Diversity, Equity and Inclusion Policy
- Code of Ethics
- Human and Culture Implementation Principles
- Disciplinary Regulation

### Legal regulations regarding principles and regulations of national and international organizations

- Application Guide for Woman Empowerment Principles (WEPs) of United Nations Global Compact
- • United Nations Guiding Principles on Business and Human Rights
- • Convention on Prevention of all forms of Discrimination against Women (CEDAW)
- • OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- • United Nations Turkey Impact of COVID-19 upon Women Policy Summary
- • ILO Manual for Combating Violence and Harassment Against Women at Work Life
- • ILO Guide for Safe and Healthy Work Environment Free from Violence and Harassment
- • Republic of Turkey Ministry of Labor and Social Security Information Guide on Psychological Harassment
- (Mobbing) at Workplaces
- • Law on Protection of Family and Prevention of Violence Against Women no. 6284
- • Convention on Elimination of Violence and Harassment at Work Life (ILO C190)
- • Presidential Circular on Prevention of Psychological Harassment (Mobbing) at Workplaces no. 2025/3

# Elements Damaging Sense of Safety

The right to live and work in safety is one of the most important human rights. Being exposed to violence at home or work life damages right of living and working in safety.

## ↳ Domestic violence:

Domestic violence is any act of violence (physical, sexual, psychological, economic, digital/cyber, etc.) that occurs within the family, within the family unit, or between current /former spouses/partners regardless of whether the perpetrator and the victim currently share the same household or have previously shared it.

## ↳ Violence and harassment at work life

It means a range of unacceptable behaviors and practices, or threats thereof, whether single or repeated, that are intended, result in or are likely to result in physical, psychological, sexual or economic harm. It also includes societal gender-based violence and harassment. (ILO C190)

Violence and abuse that undermine people's safety or sense of security through physical or psychological harm or domination can take different forms:

## ↳ Physical violence:

It is use of the physical power as a tool of violence for the purpose of controlling, ruling over, humiliating, belittling or punishing a person. It can be implemented by establishing physical superiority or creating the fear that it will be established, by making physical contact or creating the fear that it will be established, or by using objects or creating the fear that it will be used.

Shouting, punching, kicking, injuring with a gun or knife, throwing objects, depriving a person of their basic needs by establishing physical superiority, or creating fear that these may occur are examples of physical violence.

## ↳ Societal gender based violence:

It is the discrimination and violence of a person or a group due to their gender, sexual orientation, gender expression or any kind of sexual diversity. Violence victims of societal gender based violence may include women, men, other gender identities and children.

One of the areas that can be considered within scope of societal gender based violence is violence against the woman. Violence against women means any act that causes physical, sexual, psychological or economic harm or pain to women because they are women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether it occurs in public or private spaces.. Violence against women is a violation of human rights and a form of discrimination against women. The word women also includes girls younger than 18 years of age.

## ↳ Psychological Violence:

It is use of the emotional power and needs for the purpose of controlling, ruling over, humiliating, belittling or punishing a person.

Systematically displaying humiliating and threatening behavior, making the person feel inadequate and weak, teasing, swearing and insulting, isolating by preventing them from seeing others are examples of psychological violence.

Mobbing at workplace is one of the most common types of psychological violence at workplace. Mobbing is all of harassment, intimidation, coercion and other similar conducts towards a person implemented by another employee/other employees. Each and every conflict or harsh approach at workplace cannot be considered mobbing. In order for a conduct to be a considered mobbing, it must be:

- Intentional,
- Be aimed at frustrating, passivation and alienating of a person from the work
- Inflict damage on the victim's professional life, physical or psychological health.

Systematic nature of violence conducts is an important component of mobbing, too. However, even a single behavior can violate personal rights and cause visible harm to the person, given the severity of the conduct (insult, public humiliation, etc.) and the negative impact it creates.

**Psychological violence manifests itself through systematic, constant and intentional demonstration of the following conducts at the workplace:**

- Yelling at a person and insulting
- Making fun of, teasing and belittling one's works and ideas in presence of her/his workmates
- Treating a person differently or discriminating against such person
- Trying to brand a person in the eye of her/his colleagues
- Ignoring a person, excluding or casting a person aside
- Constantly threatening or coercing
- Intentionally leading someone to failure, assigning tasks that are impossible to complete within the time given
- Concealing information crucial for one's works or manipulating information to mislead a person, then accusing one of conducts such as negligence or professional misconduct.

It is important to establish psychological safety to stop psychological violence. **Psychological safety** can be defined as minimizing the risk of work-related factors harming the employee's mental health or eliminating the risk of harming the employee.

## ↳ Sexual violence:

It is the act of forcing a person to have sexual intercourse in a place, way or time that they do not want, or making sexually explicit comments, harassing or assaulting them.

Likewise, it is also sexual violence if a person is physically or verbally harassed, exposed to sexually explicit words, implications or jokes.

Physical harassment, taking sexually explicit images without consent, distributing or threatening to distribute sexually explicit images, and forcing women to giving birth to or not giving birth to children are examples of sexual violence. Marital status of a person and whether a person is married or not will not change definition of violence.

## ↳ Economic violence:

It is use of the financial power and superiority as a tool of violence for the purpose of controlling, ruling over, humiliating, belittling or punishing a person.

Preventing a person from working or having a job, confiscating or controlling their income and savings, or attempting to control them, putting them in debt, or preventing them from saving money or making investments are examples of economic violence.

## ↳ Digital violence:

It is use of the technological tools for the purpose of controlling, ruling over, humiliating, belittling or punishing a person.

Constantly sending messages or calling people knowing that they are not wanted; examining social media accounts and using the information there to monitor or threaten people; sharing posts on social media that humiliate, insult or contain hate are examples of digital violence.

The perpetrator may overtly or covertly pressure the person exposed to violence to take revenge on him or her or to prevent him or her from filing a complaint or to withdraw the complaint. She/he may threaten the victim and make things harder for the victim at work life and/or private life. This is called retaliation.

Examples of retaliation include spreading false information about a person, threatening to harm their family and loved ones, obstructing their professional development, and filing a counterclaim to prevent them from filing a complaint. If the perpetrator is in a managerial position, actions such as making it difficult for the victim to exercise his/her personal rights, systematically making him/her work overtime, cutting his/her salary, preventing him/her from getting a promotion, and threatening him/her with dismissal are also considered retaliation.

## Policies Supporting Safety at home

The most important element that damages or ignores sense of feeling safe at home is domestic violence. Domestic violence affects many people, most of whom are women, around the world, and stands out as a global problem.

Therefore, Akbank and leaders of Akbank considers it a responsibility to create necessary processes and support channels in order to protect those employees who have shared how they have been exposed to domestic violence and to offer any and all supports. The Bank has a Zero Tolerance Support Line in place in order for employees to confidentially send reports regarding domestic violence they are exposed to. (Further information processes associated with evaluation of support line and reports received is given in following sections.)

Apart from supports that can be received from social institutions, the bank as an employer undertakes that necessary actions will be taken to facilitate work life of an employee who has suffered from violence and increase workplace safety.

In this scope, support channels based on confidentiality that can be used to report the situation to our bank without hesitation have been established and made available to employees in order to encourage employees who are victims of domestic violence to get out of violence cycle and take actions. Below are support actions associated with provision by the employee suffering from domestic violence to Akbank with such information and support actions that can be taken upon employee's demand. Support processes are run with the consent of an employee who is victim of violence and strictly in compliance with confidentiality principles.

- In the event of a court order given for protection of the victim or in case of a restraining order given by courts, following supports are given to the employee in order to enforce the restraining order at the workplace, too. Workplace safety planning is re-evaluated in collaboration with the employee, taking account of the employee's needs.
- The area where the employee works, at feasible locations, may be re-arranged in a way stopping such area from being seen from outside or from being publicly accessible.
- The employee's work phone, e-mail address may be modified.
- Details of account to which the employee's salary and perks are transferred may be modified so that the perpetrator of violence cannot confiscate them.
- Routes of shuttle bus used for commuting to the workplace may be re-arranged, where possible.
- It may be ensured that the employee is escorted by security guards to shuttle buses provided by the workplace or means of public transportation.
- At feasible locations, a car park service customized to the employee may be offered and it may be ensured that the employee is escorted by security guards to her/his vehicle.
- Request for relocation or remote working is considered within scope of division, branch or province, conducting a specific evaluation depending on the employee's status. Performance score, warning and punishment process, rule of serving at current branch/division for one year are ignored in respect of such assessments.
- In case of a request to change the employee's home or province, support is provided at the rate of "Household Moving Fee and Migration Compensation" within the scope of the bank's standard practice. In case of temporary accommodation need, accommodation support is provided in hotels with which the bank has agreements or based on the domestic daily hotel limit.
- In order to meet the security, psychological or health needs of the employee who is subjected to violence; the working model (office, hybrid or remote) is re-evaluated according to the needs of the person.
- The employee may be allowed to take paid administrative leave without deducting such leave from her/his leave entitlement. Leave time is considered together with the employee. Paid/unpaid leave of absence alternatives for longer durations are considered, when necessary.
- Upon employee's demand, the employee may be exempted from trainings for a maximum period of 1 year including pre-arranged trainings.
- In case of a performance evaluation period, a special performance evaluation process can be implemented that does not ignore the employee's situation, or the performance evaluation action can be postponed until a different time to be set with the employee. Leaders of Akbank deal with an employee's performance development plan in person.
- It is possible to offer psychological support as may be needed by the employee through the bank's contracted apps and platforms. It is possible to offer support to an employee when she/he needs urgent physical examination or health stats report through coordination of Aksandık.
- The employee exposed to violence may be referred to the bank's Legal Consultancy so as to receive legal information she/he needs.
- A person who is subjected to violence may not be able to be alone due to the difficult process he or she is going through, or may need someone to accompany him or her during some special processes (court, relocation, health report, etc.). In this case, the company evaluates the request of the employee who wants to establish solidarity with the colleague who is subjected to violence and, if deemed appropriate, may provide him/her with paid special administrative leave.
- Apart from supports listed above, the fact that unforeseen and other urgent needs may emerge specifically for every case of violence is taken into consideration and each incident is evaluated per se.

On the other hand, employment relationship of those employees who has committed household violence according to court decrees is evaluated, and, likewise, it is considered whether an employment relationship with those candidates against whom such court decrees have been rendered will be established or not.



## Policies Supporting Safety at Work

Failure to create a physical and psychological safe environment in the workplace has an impact not only on the individual level but also on the institutional and societal level.

Acts of violence and abuse that undermine the feeling of safety in the workplace can occur from top to bottom (from superiors to subordinates), from bottom to top (from subordinates to superiors), or horizontally (between equals).

Employees may remain silent against these behaviors and approaches for reasons such as damaging their business relationships, fear of losing their job, concerns that they will not be believed, avoiding appearing incompetent, or lack of self-confidence.

In order to prevent such situations, Akbank puts into practice a "zero tolerance" approach to all forms of violence, abuse and behavior that harm the creation of a safe environment in the workplace. In this context, support channels based on complete confidentiality have been created and shared with employees, through which our employees can convey situations that undermine physical and psychological safety in the workplace without hesitation.

In the event that violence is encountered at workplace and necessary reports are sent, principles associated with the process to be implemented apart from supports listed in the previous sections have been determined:

- Employees may directly report such event to Zero Tolerance Support Line and ask for support.
- Employees may send their reports to that effect to their managers. In such case, relevant managers directly contact HR without delay and ask for support in order to run relevant processes.
- Reports directly conveyed by employees to Support Line or reports sent through their managers are evaluated within 24 hours in accordance with principles of confidentiality.
- Throughout report evaluation process;
  - Change of employment location, team change or re-assignment can be considered depending on needs of the victim employee.
  - The victim employee's form of working, i.e., from office, hybrid or remote, can be re-considered.
  - The victim employee may be considered to take paid annual leave or administrative leave within the periods to be determined based on needs.
  - Upon discovery of the fact that the victim employee has suffered a loss of material right as a result of an incident of violence, recovery of such right loss can be considered.
  - Mandatory paid annual leave or administrative leave may be considered for a person who has been reported to have committed violence throughout the process.
  - It is possible to offer psychological support as may be needed by the employee through the bank's contracted apps and platforms.
  - In case of a performance evaluation period, the party that will conduct such evaluation can be considered again, or the performance evaluation action can be postponed until a different time to be set with the employee.

- Results of evaluation can be discussed with the reporting employees and information related to assessment results is provided.
- An employee reserves the right of initiating legal proceedings related to the subject matter at all times. Under no circumstances may be incitation for not initiating legal proceedings or keeping it confidential allowed.
- Where necessary, the subject matter is escalated to Presidency of Inspection Board, an action is taken within framework of rules set forth in our "Disciplinary Regulation" against the person who is found out to have committed acts damaging or destroying trust at the workplace.

## Review of Reports

Akbank and leaders of Akbank, in case of domestic violence and violence and harassment at workplace, act in compliance with following principles at all phases of incident management so that handling of incidents and management of process will not lead to secondary victimizations and employees are provided with support they need completely and in a timely manner:

**Safety:** Priority is attached to a person's safety in respect of supports and sanctions defined in the guide.

**Taking Care:** In the practices envisaged in the Policy, attitudes and behaviors that will cause secondary victimization of the person exposed to violence and that will harm human dignity and sense of trust are avoided, and the entire process is carried out with utmost care.

**Taking Consent:** Within the scope of the Policy, the nature and consequences of all measures to be taken in the process of combating violence are conveyed to the victim in a clear and understandable manner, approval of the victim is taken as basis for the steps to be taken; no action is taken without the consent of the person.

**Confidentiality:** Supports and sanctions defined in the Policy are put into practice in a manner that will protect confidentiality of individuals' private and work lives. In this context, interviews with individuals and other related information may not be shared with third persons without a person's written informed consent. On the other hand;

- "There being justified reasons to believe that his/her life, health or freedom is at risk in order to protect the service user,
- Exceptions may be made for the safety of others if there are justified reasons to believe they are at risk. However, it may give the person preliminary information regarding the process, underlining corporate responsibility.

**Urgency:** Necessary measures are taken and supports are offered without delay once a complaint or an application is received.

**Non-Discrimination:** The policies set forth in the document are implemented without discrimination on the basis of gender, gender identity, sexual orientation, marital or family status, pregnancy, ethnic origin, national identity, birth, religion, sect, belief, language, accent, appearance, health status, disability, age, education level, class, cultural and social position, political or philosophical views, status or any other basis.

**Being Inclusive:** The characteristics of individuals that cause them to be subject to discrimination and exclusion (ethnicity, age, disability, sexual orientation, gender identity, etc.) are taken into account, diversity is respected, and practices customized to the individual and the situation are implemented.

**Taking into Consideration Victim's Statement:** In order to implement the support and sanctions within the scope of the Policy, the statement of the person exposed to violence is taken into account and the relevant measures are implemented immediately by taking this statement into account and conducting the necessary examinations within the framework of confidentiality. Taking into account the statement of a person exposed to violence means that the statement is evaluated as a denouncement, taking into account the best interests of the person exposed to violence, since violence is often a phenomenon without witnesses or material evidence.

# Awareness and Training

Raising awareness about the subject matter and informing persons so as to prevent all forms of violence come to the fore as a very crucial element. In order for Akbank employees to be more sensitive and to know what to do in view of situations at hand;

- Intensive awareness-raising activities are carried out throughout the institution, and employees are regularly informed about the types of violence, the roles and responsibilities of individuals in preventing violence, and the actions that can be taken in case of encounter or witnessing violence.
- "Gender Equality Training" is designed to raise awareness about gender roles and equality and is made accessible to all employees.
- "Zero Tolerance to Violence" training is made available to all employees to reinforce the steps to be taken to prevent violence and to provide guidance on what to do if it is encountered.
- Special "Gender Equality" and "Prevention of Violence" mandatory trainings are given to the team members who will implement the policy.
- Mandatory training on "Prevention of Violence" is provided especially for leaders who have important duties and responsibilities in building workplace trust and preventing all forms of violence.

## Support Channels

### a. External Support Channels

Some of support channels outside the company to which persons may apply or where persons may direct relevant persons are as follows:

- Emergency Consultancy Lines
- ALO 183 Social Consultancy Line for Families, Women, Children and the Disabled
- ALO 155 Police Emergency Line
- ALO 156 Gendarmerie Emergency Line
- ALO 170 Working Life Communication Center
- ALO 112 Emergency Ambulance Service
- Domestic Violence Emergency Help Line
- İBB (Istanbul Metropolitan Municipality) Support for the Woman Line
- Violence Prevention Monitoring Centers (SONİM)
- Women's Rights Center of Istanbul Bar Association
- Presidential Communication Center (CİMER)
- Grand National Assembly of Turkey (TBMM) Petition Commission
- Ministry of Labor and Social Security
- Human Rights and Equality Institution of Turkey (TIHEK)
- Ombudsman Institution
- Non-Governmental Organizations
- Mor Çatı Women's Shelter Foundation
- End to Domestic Violence Emergency Help Line
- KADES (Woman Support App)

### b. Internal Support Channels

Zero Tolerance Support Line has been established for our employees declaring that they have been exposed to violence at home or at workplace. Following principles are adhered to for the purpose of assessment of reports conveyed to support line and/or conveyed by managers:

- It is possible to contact support line via e-mail address [sifirtolerans@akbank.com](mailto:sifirtolerans@akbank.com) and by dialing 212 385 62 34.
- Reports received at support line are considered in no later than 24 hours.
- All assessments are carried out in strict confidence. Nobody is informed about owner of the feedback except for employees taking part at the assessment team.
- Vice President, Human and Culture, relevant Heads of HR Department and responsible executive from Working Relations team carry out our assessments without favoring any hierarchical level. According to the assessment;
- The subject matter can be escalated to Presidency of Inspection Board, an action is taken within framework of rules set forth in our "Disciplinary Regulation" against the person who is found out to have committed acts damaging or destroying trust at the workplace.
- Reports received are submitted to the General Manager for opinion, and actions to be taken are determined and put into practice
- Reports received and actions taken are periodically reported to the Sustainability Committee anonymously.