



ART TERSANE A.Ş.
**Policy on Prevention of Harassment,
Retaliation, Bullying and Discrimination**

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ART Tersane A.Ş. is committed to provide its employees a work environment without suffering harassment, retaliation, bullying and discrimination.

We remind our employees to respect each other and to adopt different cultures and diversity as a team in our shipyard as a team. This may mean learning to change their behavior to prevent our employees from unintentional upset. Our employees should not forget that they have a responsibility to each other if they are exposed to harassment, retaliation, bullying and discrimination.

Harassment, retaliation, bullying and discrimination are examples of conduct that is unwanted and causes detrimental effects, which may include: Stress, Lack of motivation, Reduced work performance, Absence from duties; and resignations.

Harassment is a form of discrimination which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment includes any inappropriate and unwelcome conduct which, whether intentionally or not, creates feelings of unease, humiliation, embarrassment or discomfort for the recipient.

Retaliation is a situation that will not be tolerated as much as responding to an evil that is done, and as the fault of the person who shows the least inappropriate behavior. Retaliation involves inappropriate and unpleasant behaviors, whether intentional or not, creating discomfort, humiliation, shame or discomfort for the person being applied.

Bullying is a form of harassment that includes hostile or vindictive behaviour, which can cause the recipient to feel threatened or intimidated. It results in a work environment in which a group of people or an individual may become threatened or intimidated because of the negative or hostile behaviour of another group of people or individual.

Bullying may involve a misuse of power or position and is often persistent and unpredictable. It may be vindictive, cruel or malicious. However it can also arise when a person is unaware of the effect that their behaviour is having on other persons, or does not have any intention to bully.

Discrimination is the act of arbitrary or unfair behavior based on any quality of a person and thereby victimization. It is to pursue, isolate or hold any separation that has an eradicating or distorting effect on the job, occupation, or treatment to be acquired in terms of race, color, gender, religion, political belief, national or social origin, or treatment to be acquired in the acquired business or profession. Discrimination can occur as a different treatment of people in the same or similar situation, or it can occur by treating people in different situations in the same way.

Company recognize below examples and similar as harassment:

- Displaying or circulating offensive or suggestive material;
- Innuendo, mockery, lewd or sexist/racist/homophobic jokes or remarks;

- Use of offensive language in describing or making fun of someone with a disability;
- Comments about a person's physical appearance or character which cause embarrassment or distress;
- Unwelcome attention such as spying, stalking, pestering, overly familiar behaviour or unwelcome verbal or physical attention;
- Making or sending unwanted, sexually suggestive, hostile or personally intrusive telephone calls, text messages, emails, comments on social networks, faxes or letters;
- Unwarranted, intrusive or persistent questioning about a person's age, marital status, personal life, sexual interests or orientation, or similar questions about a person's racial or ethnic origin, including their culture or religion;
- Unwelcome sexual advances or repeated requests for dates or threats;
- Suggestions that sexual favours may further a person's career, or that not offering them may adversely affect their career;
- Leering, rude gestures, touching, grabbing, patting or other unnecessary bodily contact such as brushing up against others; and
- Spreading malicious rumours, or insulting someone (particularly regarding age, race, marriage, civil partnership, pregnancy and maternity, sex, disability, sexual orientation, religion or belief, and gender reassignment).

Situations or behaviors that could lead to an employee engaging in a Protected Activity against retaliation include, but are not limited to the following;

- Discrimination or harassment
- Fraud
- Unethical or unprofessional business conduct
- Non-compliance with ART Tersane A.Ş. policies/procedures, including the Code of Conduct
- Real or potential threats to ART Tersane A.Ş. workers or the public's health and/or safety
- Violations of local, state or federal laws and regulations
- Other illegal or improper practices or policies

Company recognize below examples and similar as bullying:

- Verbal or physical threats or abuse, such as shouting or swearing at colleagues, either in public or in private, including derogatory or stereotyped statements or remarks;
- Personal insults;

Doküman No	PT-04/200
Sayfa No	3/4
Revizyon No	-
Revizyon Tarihi	
Yayın Tarihi	19.04.2024

- Belittling or ridiculing a person, or his/her abilities, either in private or in front of others;
- Sudden rages or displays of temper against an individual or group, often for trivial reasons;
- Subjecting someone to unnecessary excessive or oppressive supervision, monitoring everything they do or being excessively critical of minor things;
- Persistent or unjustified criticism;
- Making unreasonable demands of staff or colleagues
- Setting menial or demeaning tasks that are inappropriate to the job or taking away areas of responsibility from an individual for no justifiable reason;
- Ignoring or excluding an individual from social events, team meetings, discussions and collective decisions or planning;
- Making threats or inappropriate comments about career prospects, job security or performance appraisal reports; and
- Spreading malicious rumours, or insulting someone (particularly regarding age, race, marriage, civil partnership, pregnancy and maternity, sex, disability, sexual orientation, religion or belief, and gender reassignment).
- Shunning people at work and rebuffing their efforts to integrate with others if they are believed to 'not fit in';
- Cyber bullying including inappropriate:
 - Suggestive and unwanted remarks;
 - Graphics or threat-centred, abusive emails;
 - Postings on social networks; and
 - Text messages.
- There are sometimes situations when excuses are made to, define or refer to behaviour or situations between people at work which may involve 'hidden' bullying:
 - Strong or robust management styles;
 - A working relationship that is described as a 'personality clash';
 - Someone being described as 'over-sensitive' or 'unable to take a joke';
 - Describing someone as having an 'attitude problem';
 - A manager who 'has a low tolerance for non-safety critical mistakes which are made unintentionally; and
 - Making fun of someone who has made a minor mistake at work.

ART Tersane A.Ş. will treat all complaints of harassment and bullying seriously and in strict confidence. Complain procedure is in place for any reporting of such occurrences. HR Manager

are responsible for dealing with complaints of harassment and bullying. You may approach either or both to report any incident you have suffered.

The company considers any complaint of cyber bullying to be a serious issue.

If employee do not feel comfortable raising a complaint yourself, may ask a friend or colleague to do so on his/her behalf. No one will be penalised by the company for making a complaint, provided it is not vexatious or made maliciously.

Each employee of the company should remember, it is the victim's perception of any actions that counts. If YOU feel you have suffered harassment or bullying, the company will look into the issue raised.

Discrimination is any negative action or attitude directed toward someone because of protected characteristics, like race and gender. Company recognize below examples as other types of discrimination:

- Age
- Religion
- Ethnicity / nationality
- Disability / medical history
- Marriage / civil partnership
- Pregnancy / maternity/ paternity
- Gender identity / sexual orientation

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