



GENDER EQUALITY POLICY

PENTHOL GROUP OF COMPANIES GENDER EQUALITY POLICY

1. PURPOSE AND SCOPE

This Gender Equality Policy (“**Policy**”) sets out the guiding principles and mandatory requirements for promoting gender equality and the empowerment of women across our governance practices and operations as Penthol Group of Companies (“**Penthol**”) in line with the UN’s Sustainable Development Goals, to emphasize our global efforts on gender equality.

This Policy outlines our approach to ensuring equal opportunities for all, regardless of gender, in a global scale. Our employees and managers within the countries in which we operate are obliged to act in accordance with this Policy.

2. DEFINITIONS

Business Partners: Our suppliers, customers, contractors, all sorts of representatives, subcontractors and consultants, institutions/organizations with which we do business with including any other third parties.

Empowerment of Women and Girls: An expansion of agency throughout women’s lives, via participation and decision-making, comprising support to (i) women’s rights, access to and control over resources; (ii) women’s access to opportunities/resources; (iii) actions to transform the structures and institutions which reinforce and perpetuate gender discrimination and inequality; and (iv) women’s ability to exert influence in society. ¹

Gender: The roles, behaviors, activities, and attributes that a given society at a given time considers appropriate for men and women. In addition to the social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, gender also refers to the relations between women and those between men. Gender is part of the broader socio-cultural context, including class, race, poverty level, ethnic group, sexual orientation, and age. In most societies there are differences and inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities.²

Gender Equality: The equal rights, responsibilities and opportunities of women and men and girls and boys. Equality does not mean that women and men will become the same but that women’s and men’s rights, responsibilities and opportunities will not depend on whether they are born male or female.

Human Rights: Rights that are unique for every person irrespective of gender, race, ethnicity, religion, language, age, nationality and other differences in opinions and wealth; it also mentions the right to equality, freedom and dignity.

¹ UN Women, Office of the Special Adviser on Gender Issues and Advancement of Women (OSAGI) - Concepts and Definitions

² Ibid.

3. GENERAL PRINCIPLES

As Penthol, one of the most important ethical principles we take into account is gender equality. We are committed to promoting gender equality by ensuring equal access to opportunities and fostering an inclusive workplace where all employees are treated with respect and dignity, eliminating all forms of discrimination against women and supporting the education of girls.

We also expect our business partners to uphold these principles and urge them to adopt similar policies within their own businesses.

4. OUR COMMITMENTS

In line with our corporate strategy and ethical principles, which takes into account diversity, inclusion and equity, we are committed to:

- Promoting diversity, inclusion and equity in the workplace,
- Ensuring and maintaining a balance of gender equality among our employees,
- Using a language of expression that is suitable for gender equality in our internal and external communications,
- Implementing measures for the elimination of gender-based discrimination and harassment, and not tolerate any kind of discrimination,
- Adopting an understanding that respects universal human rights towards our employees, defending the rights of our female and male employees equally in all our processes without gender discrimination,
- Providing equal opportunities in recruitment, performance management, remuneration, training, professional development and promotion,
- Ensuring fair and equal pay for equal work, preventing gender pay discrimination,
- Observing a zero-tolerance approach against verbal, physical, sexual, psychological and/or emotional violence/harassment, developing open communication mechanisms against all cases of violence/harassment, investigating cases objectively and concluding them by applying necessary sanctions,
- Developing processes to ensure a work-life balance, taking the necessary measures to prevent employees who are parents from being disadvantaged,
- Supporting work-life balance and flexible working conditions,
- Raising awareness about gender equality and inclusion in business life among employees,
- Implementing corporate social responsibility activities promoting gender equality (i.e., empowerment of women in social and business life, supporting the education of girls),
- Developing corporate culture through suggestion and complaint mechanisms and gender equality practices,
- Developing partnerships and collaborations with academics, NGOs and other institutions on gender equality,
- Adhering to and comply with the national and international declarations on gender equality,
- Informing and encouraging our business partners to promote gender equality.

5. TRAINING

We provide human rights (including gender equality) awareness training (through face-to-face or e-learning practices), which is available to all staff and mandated for selected staff working in high-risk priority departments such as Finance, Sales & Marketing, and Human Resources.

6. IMPLEMENTATION, REVIEW AND ENFORCEMENT

Our Gender Equality Policy was published on 30.11.2023 with the approval of our President. Our Ethics Committee shall examine this Policy on a regular basis, taking into account the current requirements and changes to our operating conditions. After approval of our President on the basis of a recommendation by our Ethics Committee, amendments considered to be necessary shall take effect. In order to ensure that this Policy is observed and regularly followed-up on possible violations and suspicious situations identified as part of improvements, our President shall be in charge at the highest level.

Any employee who believes that there is a conflict between the language of the Policy and our activities, has questions about this Policy, or wishes to report a potential violation of this Policy confidentially, can raise these concerns to the Human Resources Manager.

We shall also make effective use of our ethics@penthol.com hotline for the purpose of ensuring compliance with this Policy, in order to monitor possible violations and suspicious situations on a regular basis as part of improvements. We also strive to ensure that our business partners evaluate their operations within the scope of their commitments to international organizations in terms of gender equality. Policy-related feedback and possible Policy violations and non-compliances can be reported via ethics@penthol.com.

Criminal sanctions may be applied according to the provisions of regarding legislation if any violations or suspicious situation are detected that is contrary to the principles laid down in this Policy.

Penthol Gender Equality Policy shall be made available to all our business partners and stakeholders, including employees, through our company website and intranet site.