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		DTY-INS-PRO02
Subject	HARASSMENT AND ABUSE	

1. Purpose

The purpose of this Procedure is to clearly articulate the principles, commitments, demands, and stance on preventing child labor, prohibiting forced labor, and supporting youth employment in our company.

2. Scope

This Procedure covers all activities of our company.

3. Responsibility

All personnel, especially Human Resources, are responsible for carrying out the activities.

4. Definitions

1. DEFINITION OF HARASSMENT

Harassment refers to verbal or physical behavior, with or without the use of coercive force, directed towards an individual or individuals based on race, origin, religion, sexual preference, gender, or personal characteristics, causing humiliation.

1.a/ Definition of Physical Harassment: Any behavior that may cause any form of harm to a person's body constitutes physical harassment. Slapping, punching, pushing, throwing objects, exposing to cold, using sharp objects, kicking, etc.

1.b/ Definition of Verbal Harassment: The use of derogatory words (e.g., swearing) and verbal threats that may damage the reputation of employees.

1.c/ Definition of Psychological Harassment (mobbing): Mobbing involves psychological pressure, violence, disturbing or causing distress.


Example: Making someone feel as if they can no longer perform a task they have been doing for a year and assigning them a simpler task. For instance, telling someone who has been working as a machine operator for a year that they will now be a laborer.

1.d/ Definition of Sexual Harassment: Sexual harassment refers to unwanted exposure to visual or physical gestures, jokes, or advances, even when the individual does not desire it.

Behaviors that constitute harassment include disrespectful actions that cause personal discomfort and are demeaning. For example:

- Any form of unwanted joke, slander, or pointing out a fault.
- Words containing written or verbal profanity, threats.
- Malicious, suggestive, persistent looks.
- Physical or sexual assault, misconduct.
- Humiliation in front of other employees.

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Abuse is defined as illegal events that can be characterized as deceitful, concealing, or trust-damaging.

The aim is to take advantage of the good intentions of employees and senior manager within the company for personal gain. In this context, Abuse and Exploitation should be evaluated from both the employer and employee perspectives.

5. Implementation Principles

... we commit to creating a respectful and safe working environment for all our employees and customers, ensuring compliance with all applicable local and national laws from the recruitment process onwards, and not allowing any form of harassment and exploitation at any point in the workspace.

As the management, we commit to impartially and fairly reviewing all complaints considered as any form of written or verbal harassment and exploitation, and to expedite and conclude this process as quickly as possible, following up with preventive and corrective solutions.

Under no circumstances is it allowed for a person within our company to exploit the rights of another, and no one may harass another. Our necessary policy has been established to identify such situations and has been shared with all our employees.

New employees are informed about our harassment and exploitation policy by the personnel officer.


For the operation of the system and the detection of any unwanted situations:

- The Quality Management Officer conducts private interviews with employees at regular intervals.
- An anonymous survey related to the issue is conducted annually, even if no incidents occur.
- In the event of an identified situation of harassment and exploitation based on the responses of employees in the survey, the procedure is reviewed, and corrective and preventive actions are taken as necessary. The updated procedure is then used to provide training to responsible individuals and is recorded.
- All employees are retrained on the company's policies regarding harassment and exploitation.
- Within 6 months after the training, the survey is repeated, and the situation is evaluated by comparing it with the results of the previous survey.

Rights and Responsibilities of Victims of Harassment

Individuals who believe they have been subjected to harassment or have witnessed it can approach their managers, the Personnel Officer, or unit supervisors directly. In addition to this, they can also report their complaints via email or phone. The rights and responsibilities of these individuals are as follows:

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- Prompt processing of the complaint when it is made in writing or verbally.
- Being supported by a person they trust during the process.
- Fair treatment.
- Being informed about the investigation process.
- No information about the incident being reflected in the individual's file.

Rights and Responsibilities of the Person Accused of Harassment

Stay calm and do not get angry. You may have unintentionally made someone uncomfortable. You should think about what you can do to correct this situation (e.g., apologize, rectify the behavior complained about, etc.).

YOUR RIGHTS:


- To be informed about the details of the accusation.
- To know that a fair and impartial investigation is being conducted.
- To be informed about the progress of the investigation process.

Management Responsibility

Both parties, along with any witnesses if available, are interviewed, and a report about the incident is prepared. The report includes statements from the individuals involved, if available camera recordings, the conclusions reached by the management, and any resulting penalties.

- Every manager or unit supervisor is responsible for ensuring that the individuals they are responsible for work in a peaceful and respectful work environment.
- They are obligated to promptly and impartially investigate any form of harassment or exploitation complaints brought to their attention.
- Additionally, if there are behaviors deviating from the norm among employees (such as decreased performance, increased leave requests, a withdrawn employee, instances of grouping and inter-group chaos, etc.), they should be able to observe this and resolving such situations falls under their responsibilities.
- Privacy Principle: When addressing harassment allegations, management behaves in accordance with the principle of privacy for the private lives of both the complainant and the accused from the start of the complaint until the end of the investigation.

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- In cases where the incident has not been escalated to law enforcement, the identities of the complainant and the accused of harassment are never disclosed to a third party and all information is kept confidential in the case files.

Exploitation

Exploitation is defined as illegal events that can be characterized as deceitful, concealing, or trust-damaging.

From the employer's perspective, examples of exploitation against employees include:

- ✓ Incorrect calculation of entitlements.
 - ✓ Violation of employee rights according to local laws (e.g., rights to leave, forced labor, discrimination, etc.).
 - ✓ Failure to provide workplace health and safety conditions for employees.
 - ✓ Disregarding the need to bring working conditions up to an adequate level for employees.
- Examples of employees exploiting the employer and the company:
- ✓ Sharing confidential and important company information with third parties outside the company.
 - ✓ Using all the resources provided by the company for personal gain.
 - ✓ Deliberately neglecting their duties and responsibilities to harm the company.
 - ✓ Damaging the equipment and materials provided by the company for all employees and using these materials for their own benefit.

Procedure in Case of Harassment and Exploitation Occurrence


In the event of these behaviors, the management of the company evaluates the evidence and proof related to the situation. If there are witnesses, they are interviewed. Management, based on Labor and Employment Law, makes a decision regarding the matter as soon as possible. In the implementation of the decision, management strives to be objective regardless of the employee's position in the hierarchy and applies the decision fairly.

To prevent undesirable situations within the company and to maintain a peaceful working environment, training sessions are organized for all administrative staff and employees, emphasizing the company's commitment to addressing these issues.

Contact Information

Persons who have experienced harassment or exploitation can contact the following individuals via written, verbal, telephone, or email communication:

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Email: info@detaytekstil.com Phone: +90 212 277 40 43

When employees encounter a suspicious situation, they are required to report it to their managers or any superiors, even if the individuals involved are in higher positions. Reporting channels have been outlined above.

All employees, representatives, and subcontractors are responsible for providing timely, clear, and accurate answers to questions posed by the Quality Management Officer, Administrative Affairs and Procurement Officer, or authorized internal or external (independent) auditors regarding non-compliance suspicions with this procedure.

Employees providing misleading answers will be considered complicit in the offense and will be accordingly penalized.

6. Relevant Documents

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