

POLICY ON PREVENTING DISCRIMINATION, SEXUAL HARASSMENT AND INTENTIONAL INFLICTION OF HARM OF VARYING SEVERITY

«Policy on Preventing Discrimination, Sexual Harassment, and Intentional Infliction of Harm of Varying Severity» (hereinafter referred to as the «Policy») reflects the commitment of «Arassa Deniz» IE (hereinafter referred to as the «IE») and the IE's Management to labor relations where everyone has equal rights and opportunities, and where an atmosphere is maintained that encourages and promotes ethical and professional conduct by all IE employees, respecting individual values and freedoms.

The purpose of this «Policy» is to create and ensure a comfortable working environment free from discrimination, harassment, retaliation, and sexual violence, as well as actions involving the intentional infliction of harm of varying severity, and to foster and support moral standards and a high corporate culture.

The IE Management undertakes to comply with this «Policy», communicate it to all IE employees, update it on a regular basis, and ensure its availability to all Stakeholders.

The Golden Rules of the «Policy»:

- **The IE undertakes to take measures aimed at preventing and combating discrimination or harassment based on race, sex and/or gender identity, skin color, religious beliefs, age, national or ethnic origin, disability, veteran or military status, pregnancy, genetic information, marital status, or citizenship, as well as preventing actions involving the intentional infliction of harm of any severity or those committed on any other grounds prohibited by law;**
- **The IE prohibits discrimination, harassment, including sexual harassment, actions involving the intentional infliction of harm of varying severity, and the victimization of employees, interns, contractors, volunteers, and other third parties collaborating with the IE, as well as such actions by Customer employees toward IE employees;**
- **The IE Management recommends reporting violations immediately without waiting for them to resolve themselves, so that prompt action can be taken and an investigation conducted, ensuring that no IE employee is left alone to face the offender.**

1. General Provisions

1.1. All IE employees understand and are responsible for fulfilling the requirements of this «Policy». The IE Management believes that proper and strict compliance with the requirements of this «Policy» by IE employees plays a key role in the successful operations of the IE, and expects all IE Management and Heads of Departments to serve as models of proper conduct for other IE employees and to adhere to high standards of accountability.

1.2. It is essential that Heads of Departments not only adhere to the provisions of this «Policy» but also ensure compliance by their subordinates. Heads of Departments bear personal responsibility for preventing and suppressing all forms of discrimination, harassment, sexual violence, and intentional infliction of harm.

1.3. Heads of Departments are required to immediately report any instances of discrimination, any forms of harassment, or actions involving the intentional infliction of harm of varying severity that they observe, learn about from others, or suspect regarding an IE employee.

1.4. IE Management and Heads of Departments who knowingly permit discrimination, various forms of harassment, actions involving the intentional infliction of harm of varying severity, and/or retaliation, shall be held liable in accordance with the legislation of Turkmenistan.

1.5. Any IE employee who believes that he/she has been subjected to any form of discrimination, harassment, or retaliation, or any employee who has witnessed such discrimination, harassment, retaliation, or any violence, should immediately report the circumstances in accordance with the established, approved, and communicated «Whistleblowing Procedure for Unethical Conduct».

2. Anti-Retaliation and No-Sanction

2.1. The IE undertakes not to retaliate in any way against an individual who reports an alleged violation of this «Policy», participates in any investigation, or otherwise opposes alleged discrimination, harassment, or retaliation, including acting as a witness.

2.2. The IE will also not tolerate retaliatory actions by any IE employee. Retaliation against anyone who files a complaint, testifies, or assists in an investigation or legal proceeding involving cases of discrimination, harassment, sexual violence, or retaliation is a serious violation of this «Policy», as well as the law.

3. Confidentiality

3.1. The IE undertakes to maintain the confidentiality of the complaint and the confidentiality of the individuals involved to the maximum extent possible, consistent with the objective of conducting a thorough and complete investigation and to the extent permitted by the current legislation of Turkmenistan.

General Director
«Arassa Deniz» IE
(title)

M. Shvydko
(name)



November 10, 2025
(date)