

SİNPAŞ GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş.

DIVERSITY, EQUALITY AND INCLUSION POLICY

1. PURPOSE

Sinpaş Gayrimenkul Yatırım Ortaklığı Anonim Şirketi (“Sinpaş GYO” or the “Company”) believes that sustainable success is possible through a fair, respectful and inclusive workplace culture where different knowledge, experience, competencies and perspectives coexist and equal opportunities are upheld.

The purpose of this Policy is to establish the fundamental principles and guidelines regarding **supporting diversity across the Company, ensuring equal opportunities, preventing discrimination, enabling employees to have equal access to development opportunities in line with their competencies and performance, and strengthening an inclusive corporate culture.**

Sinpaş GYO considers human capital to be one of the fundamental components of its capacity to create sustainable value and recognizes that employees’ diverse knowledge, professional experience, age groups, educational backgrounds, competencies and perspectives enrich corporate decision-making processes.

2. SCOPE

This Policy covers:

- ✓ members of the Sinpaş GYO Board of Directors,
- ✓ senior management (Senior Management Team),
- ✓ all employees,
- ✓ job applicants,
- ✓ interns,
- ✓ temporary and seasonal employees.

The Company also encourages its business partners, contractors, subcontractors, suppliers and other stakeholders to act in accordance with the fundamental principles of this Policy.

The Policy is observed in recruitment, remuneration, fringe benefits, performance evaluation, promotion, assignment, training and development, career management, talent management, working conditions, employee engagement, termination of employment and all other human resources processes.

3. FUNDAMENTAL PRINCIPLES

3.1. Equality and Equal Opportunity

Sinpaş GYO adopts **providing equal opportunities** to all employees and job applicants as a fundamental human resources principle.

Recruitment, assignment of duties, remuneration, performance evaluation, career development, promotion, training and other human resources decisions are carried out based on the qualifications required by the position, the individual’s competencies, experience, performance and merit, and objective evaluation criteria.

The Company does not permit discrimination on the grounds of **gender, age, disability status, marital status, family responsibilities, nationality, ethnic origin, language, religion, belief, social origin, economic status, educational background or similar personal differences.**

The Company acts in accordance with rights protected under applicable legislation and the principle of equal treatment.

3.2. Merit-Based Approach

At Sinpaş GYO, the fundamental approach in recruitment, assignment, promotion and career development decisions is based on **merit, competence, experience, performance and the requirements of the position.**

The Company aims to support employees' career development through transparent and measurable criteria.

Managers are expected to act consistently and objectively, free from personal bias, in their assessments concerning employees.

3.3. Diversity

Sinpaş GYO believes that a balanced human resources structure comprising employees with different professional backgrounds, educational backgrounds, experiences, areas of expertise, age groups and perspectives strengthens:

- ✓ innovation,
- ✓ creativity,
- ✓ corporate resilience,
- ✓ problem-solving capability,
- ✓ better understanding of stakeholder expectations, and
- ✓ the quality of decision-making.

Accordingly, the Company supports the representation of diverse knowledge, experience and competencies at **different levels of the organization.**

4. PARTICIPATION OF WOMEN IN THE WORKFORCE AND MANAGEMENT

Sinpaş GYO recognizes the effective participation of women in working life and decision-making mechanisms as an important component of sustainable corporate development.

In this context, the Company aims to:

- ✓ support women's participation in the workforce,
- ✓ ensure equal access for female employees to career and leadership development opportunities,
- ✓ improve female representation at management levels,
- ✓ support the development of female employees in talent and succession plans,
- ✓ encourage the participation of qualified female candidates in recruitment and promotion evaluation processes.

Sinpaş GYO regularly monitors the ratios of female employees and female managers and seeks progress toward achieving more balanced representation at management levels.

The Company considers improving female representation on the Board of Directors as part of its corporate governance approach and takes into account the relevant capital markets regulations and corporate governance principles.

5. EQUAL PAY FOR EQUAL WORK AND FAIR REMUNERATION

Sinpaş GYO ensures that remuneration systems are based on **objective criteria such as the scope of the position, level of responsibility, competence, experience, performance and market conditions.**

The principles of equality and fairness are observed in remuneration decisions concerning the same or equivalent work.

The Company aims to:

- ✓ monitor potential differences in remuneration practices,
- ✓ ensure that remuneration and fringe benefit systems are implemented fairly and consistently.

Where appropriate, indicators relating to pay equity are monitored as part of sustainability performance.

6. EQUALITY IN RECRUITMENT

In recruitment processes, candidates are evaluated according to objective criteria such as:

- ✓ education,
- ✓ professional experience,
- ✓ technical knowledge,
- ✓ competence,
- ✓ suitability for the position, and
- ✓ alignment with the Company's values.

Job postings and recruitment processes are intended to reach as broad a candidate pool as possible.

Providing candidates with equal evaluation opportunities in selection and placement processes is a fundamental principle.

7. EQUALITY IN CAREER, PROMOTION AND DEVELOPMENT

Sinpaş GYO supports fair access for all employees to opportunities through which they can develop their careers.

In training, talent development, leadership development, job rotation and promotion processes, employees':

- ✓ performance,
- ✓ competencies,
- ✓ potential,
- ✓ professional experience, and
- ✓ the requirements of the position

are taken into consideration.

It is essential that employees' personal differences do not adversely affect their career development.

8. EMPLOYEES WITH DISABILITIES AND ACCESSIBILITY

Sinpaş GYO supports the effective and equal participation of individuals with disabilities in working life.

Within the framework of applicable legislation, the Company attaches importance to facilitating access to the workplace for employees with disabilities and making reasonable accommodations to enable them to perform their duties effectively.

Efforts aimed at improving the accessibility of physical workplaces, business processes and appropriate digital applications are encouraged.

9. INTERGENERATIONAL DIVERSITY

Sinpaş GYO considers bringing together the experience, expertise and working approaches of different generations valuable for corporate development.

In addition to developing the knowledge and skills of younger employees, the transfer of institutional knowledge and experience of experienced employees to new generations is also supported.

Accordingly, the use of mentoring, knowledge sharing, training, development and talent management practices is encouraged.

10. INCLUSIVE WORKPLACE CULTURE

Sinpaş GYO aims to create a working environment in which every employee can safely express their views, feels respected and is able to participate in corporate processes.

Accordingly:

- ✓ mutual respect,
- ✓ courtesy,
- ✓ collaboration,
- ✓ open communication,
- ✓ employee participation,
- ✓ valuing different opinions

are regarded as fundamental components of the corporate culture.

No employee may be subjected to adverse treatment for expressing an opinion or suggestion in good faith.

11. ZERO TOLERANCE FOR DISCRIMINATION, HARASSMENT AND MISTREATMENT

Sinpaş GYO adopts a **zero-tolerance approach** toward discrimination, workplace bullying (mobbing), psychological or physical harassment, threats and similar conduct that undermines human dignity.

Employees are expected to treat one another, managers, customers, business partners and other stakeholders with respect.

Conduct contrary to these principles is assessed in accordance with the Company's ethical rules, human resources procedures and applicable legislation.

12. EMPLOYEE FEEDBACK AND GRIEVANCE MECHANISMS

Employees may report situations in which they believe this Policy has been violated through the reporting and grievance mechanisms established within the Company.

Reports are evaluated in accordance with the principles of:

- ✓ confidentiality,
- ✓ impartiality,
- ✓ fairness,
- ✓ protection of personal data, and
- ✓ protection against retaliation.

No retaliation or adverse action is permitted against employees who make reports in good faith, provide information or participate in investigation processes.

Where deemed necessary, corrective and preventive actions are planned and implemented.

13. TRAINING AND AWARENESS

Sinpaş GYO supports the development of awareness regarding diversity, equal opportunity, inclusive leadership, ethical conduct, prevention of discrimination and employee rights.

In particular, the Company aims to develop information and training activities concerning managers' responsibilities in relation to:

- ✓ objective recruitment,
- ✓ performance evaluation,
- ✓ employee development,
- ✓ ensuring equal opportunities, and
- ✓ inclusive team management.

14. SUPPLY CHAIN AND BUSINESS PARTNERS

Sinpaş GYO expects its suppliers, contractors, subcontractors and other business partners to act responsibly with regard to:

- ✓ respect for human rights,
- ✓ equal and fair treatment of employees,
- ✓ prevention of discrimination,
- ✓ creation of safe working environments, and
- ✓ compliance with applicable employment and labour legislation.

Where deemed necessary, the Company encourages the incorporation of these principles into supplier and business partner evaluation processes.

15. RESPONSIBILITY OF THE BOARD OF DIRECTORS AND SENIOR MANAGEMENT

The Board of Directors and senior management undertake a leadership role in ensuring that the diversity, equality and inclusion approach is embraced throughout the Company.

The Board of Directors may monitor relevant indicators and developments deemed appropriate through the relevant committees.

Senior management is responsible for reflecting the Policy in business processes and corporate culture.

The Human Resources department coordinates the implementation of the Policy, its integration into relevant human resources processes, the monitoring of performance indicators and the execution of necessary improvement activities.

16. PERFORMANCE MONITORING AND MEASUREMENT

Sinpaş GYO aims to evaluate its diversity, equality and inclusion performance through a continuous improvement approach.

In this context, the following indicators may be monitored where appropriate:

- ✓ total number of employees and distribution by gender,
- ✓ percentage of female employees at management levels,
- ✓ percentage of female members on the Board of Directors,
- ✓ employee distribution by age group,
- ✓ number and percentage of employees with disabilities,
- ✓ distribution of newly hired employees by gender and age group,
- ✓ distribution of employees receiving promotions,
- ✓ participation rates in training and development programmes,
- ✓ employee turnover rates,
- ✓ employee engagement and satisfaction indicators,
- ✓ pay equity indicators,
- ✓ number of reports submitted and resolved concerning discrimination,
- ✓ participation rates in relevant training programmes.

The identified indicators are evaluated annually where necessary and used to improve sustainability management, human resources and corporate governance processes.

17. TARGET SETTING AND CONTINUOUS IMPROVEMENT

Sinpaş GYO may establish measurable targets in order to improve its performance in the areas of diversity and equal opportunity.

Targets shall:

- ✓ be based on an analysis of the current situation,
- ✓ include a baseline year,
- ✓ be measurable,
- ✓ specify the targeted completion period, and
- ✓ have their achievement status regularly monitored.

Continuous improvement in performance is particularly pursued in the areas of women's participation in the workforce and management levels, employee development, accessibility, equal pay and employee engagement.

18. EFFECTIVE DATE, RESPONSIBILITY AND REVIEW

This Policy enters into force upon the **approval of the Board of Directors of Sinpaş Real Estate Investment Trust Inc.**

The relevant Human Resources department is responsible for coordinating the implementation of the Policy, while the relevant Company departments are responsible, within the framework of their respective duties and authorities, for linking the Policy with sustainability and corporate governance processes.

The Policy is reviewed as necessary, taking into consideration:

- ✓ changes in legal regulations,
- ✓ developments in national and international good practices,
- ✓ changes in the Company's activities and organizational structure,
- ✓ stakeholder expectations, and
- ✓ sustainability targets.

Material amendments are updated with the approval of the Board of Directors.

Sinpaş GYO considers the **development of an inclusive workplace culture that values diversity, provides equal opportunities, is based on merit and respects human dignity** to be an integral part of sustainable corporate success.

Prepared by: Sustainability Committee / Human Resources Department

Approved by: Board of Directors
