

EVAM Grievance and Disciplinary Policy

1. Purpose

This policy outlines the principles and procedures governing grievance and disciplinary actions at EVAM. EVAM is committed to a fair, respectful, and safe environment where all stakeholders can raise concerns without fear of retaliation. It aims to uphold fair, transparent, and equitable treatment, fostering a positive environment consistent with OECD standards.

2. Scope

This policy applies to all EVAM stakeholders, including employees, contractors, customers, suppliers, investors, and any external parties affected by EVAM's activities.

3. Policy Principles

EVAM upholds the following principles:

- Accessibility: Grievance mechanisms are available to all stakeholders
- Predictability: A clear process with defined timelines
- Equity: Fair and impartial treatment
- Transparency: Clear communication of processes and outcomes
- Dialogue and Engagement: Constructive engagement to resolve issues

4. Submission of Grievances

Stakeholders can raise concerns through the following channels:

- Email: ethics@evam.com
- Internal reporting (for employees): line manager, HR, or senior management

External stakeholders are encouraged to use the email channel. All submissions are treated confidentially to the extent possible.

5. Grievance Procedure

Step 1 – Informal Resolution

Stakeholders are encouraged to resolve concerns informally where appropriate.

Step 2 – Formal Submission

A written grievance may be submitted outlining the issue and desired outcome.

Step 3 – Review and Meeting

Relevant functions review the grievance and may arrange a discussion.

Step 4 – Investigation

An impartial investigation may be conducted where needed.

Step 5 – Resolution

Appropriate corrective or preventive actions are defined.

Step 6 – Communication

A formal response is provided, typically within 10 working days after review.

Step 7 – Appeal

Stakeholders may appeal the decision within 5 working days.

6. Confidentiality and Non-Retaliation

All grievances are handled confidentially. EVAM strictly prohibits retaliation against anyone raising concerns in good faith.

7. Responsibilities

Stakeholders: Raise concerns respectfully and accurately.

Managers: Handle grievances fairly and promptly.

P&C / ESG: Oversee the process and ensure alignment with standards.

8. Governance and Oversight

Grievances may be escalated to senior management or the ESG Committee. Insights are used for risk management and continuous improvement.

9. Continuous Improvement

EVAM regularly reviews this policy to improve effectiveness and align with best practices.

Approval

Approved by: Doruk Mutlu, CEO

Effective Date: November 2024

Version: Rev.1

Review Cycle: Annual

Revision History

Rev.0: Initial release of the policy

Rev.1 – Updated for B Corp alignment, including stakeholder scope expansion, public grievance mechanism, and strengthened governance framework