



DOĞAN GROUP

HUMAN RIGHTS POLICY



1. OBJECTIVE

The objective of this policy is to explain the respect we pay for basic human rights in the course of our activities as the Doğan Group, and the value we place in our employees.

2. SCOPE

As Doğan Group, we expect all our companies to act in accordance with our Human Rights Policy. This policy covers our basic principles for human rights.

Our Human Rights Policy involves;

- ✓ the members of the Board of Directors of Doğan Group,
- ✓ the managers and employees of Doğan Group,
- ✓ our affiliates and subsidiaries and their employees,
- ✓ our external service providers, other persons and institutions (business partners) undertaking work on behalf of the Doğan Group companies including consultants, lawyers and external auditors

This policy is an inseparable part of

the Code of Ethics, Environmental Policy, Occupational Health and Safety Policy, Human Resources Policy and all relevant documents which have been approved by the Executive Committee, and made public.

3. DEFINITIONS AND ABBREVIATIONS

This section briefly explains the special terms and phrases, concepts and acronyms mentioned in this policy.

3.1. Doğan Holding refers to Doğan Şirketler Grubu Holding A.Ş.

3.2. Doğan Group refers to Doğan Şirketler Grubu Holding A.Ş. and its affiliates, subsidiaries as well as its business partnerships where it owns more than 50% of the shares.

3.3. Senior Management refers to Doğan Holding Chief Executive Officer and Executive Board Members.



3.4. Document refers to the procedures and all kinds of other similar texts which contain the policies, regulations, procedures and work processes of Doğan Holding and which are accessible to the relevant employees.

3.5. Name of the Document refers to the topic of the document.

3.6. Employee refers to Doğan Group personnel.

3.7. Service Provider refers to the personnel of the company which provides services to Doğan Group and/or which the Doğan Group provides services to (supplier, subcontractor, customer, etc.)

4. ROLES AND RESPONSIBILITIES

4.1 Board of Directors

The Board of Directors is responsible for the supervision of the establishment and enforcement of the reporting, inspection and enforcement mechanisms put into place in case of failure to comply with the policy, rules and regulations.

4.2 Senior Management

The Senior Management is responsible for approving the Human Rights Policy. Senior Management is the authorised approval mechanism for ensuring that this Policy hereby is prepared, published, updated when necessary, and abolished.

It is also the Senior Management's responsibility to enforce and inspect the practices related with the Human Rights Policy.

Senior Management is also responsible for taking the necessary measures to ensure the compliance of its employees and external service providers with the principles of this policy and reporting the issues to the Vice Presidency of Internal Audit for the review of matters contrary to the policy.

4.3 General Counsel

General Counsel is responsible for preparing, developing, executing and updating this policy. General Counsel reviews this policy, when necessary, in terms of its actuality and need for development and makes suggestions to the Senior Management.

4.4 Employee

Employees are responsible for



- ✓ adhering to and complying with the Doğan Group policies, regulations and procedures,
- ✓ working in accordance with the legislation in force,
- ✓ reporting any conduct, activity or practice contrary to this document to the Vice Presidency of Internal Audit.

4.5 External Service Providers and Business Partners

External Service Providers and business partners must comply with the principles of the policy and other relevant regulations. All relations are terminated with non-compliant persons and/or institutions. When working with subcontractors, suppliers, clients, joint ventures, and other partners, it is expected from them to respect human rights. It is essential that inspections are conducted to ensure compliance with the implementation principles of this policy and the relevant legislation.

4.6 Directorate of Information Systems

Doğan Holding Information Systems Manager is responsible for publishing the prepared document on the corporate portal.

4.7 Vice Presidency of Corporate Communication

Doğan Holding Corporate Communications Manager is responsible for the in-house distribution of the prepared document.

4.8 Directorate of Investor Relations

Within the framework of this policy, the Directorate of Investor Relations is responsible for regulating the relations between the corporate investors, portfolio managers, analysts, current and potential investors of the Doğan Group and for carrying out public disclosure practices in a transparent way notifying all the concerned parties simultaneously. The head of Doğan Holding Investor Relations is responsible for publishing the prepared document on the company website.

5. PRINCIPLES OF IMPLEMENTATION

As the Doğan Group, we adhere to the international declarations, principles, agreements and conventions that our country is a party of, mainly the Human Rights articles set forth in the Constitution, in all our activities, and we place importance in respecting all the rights of our employees.



In order to support the policy, we are developing the necessary methods of operation to create a working environment whereby human rights are respected, and to ensure that we do not partake in activities which directly or indirectly violate human rights.

As the Doğan Group, we make sure that the approaches that will make it possible to comply with the relevant legislation of the countries we operate in, in all our processes, are implemented.

To this end, we carry out the followings as the Doğan Group:

- ✓ We make sure we treat our employees equally, presenting them equal opportunities without discrimination on the basis of religion, language, race, age, skin colour, nationality, or social origin, and gender. In our Group human resources selection, hiring, placement, training, and remuneration processes are carried out taking as the basis qualifications, performance, skills, and experience.
- ✓ As the Doğan Group in line with our principle of “equal pay for equal jobs”, we are very sensitive about presenting equal salary opportunities for our employees, and competitive advantages within the scope of the market conditions.
- ✓ We are committed to present a safe working environment for our employees, away from all harassment, abuse, exploitation, and violence.
- ✓ We place importance in enhancing health and safety in the work places we operate.
- ✓ We support the freedom of collective agreement, within the framework of the right of association, the right of organisation, and trade unions that are recognised by law.
- ✓ We do not tolerate mandatory or forced employment.
- ✓ We absolutely do not employ child labour within the Doğan Group,
- ✓ We do not discriminate in a way that is against the law at the work place.
- ✓ We make sure that human rights practices are included in the internal communication channels and training programs within the Doğan Group.
- ✓ We develop practices in compliance with the Occupational Health and Safety Legislation, and we make sure that our employees’ awareness is increased concerning these issues.