



DOĞAN GROUP

HUMAN RESOURCES POLICY



1. OBJECTIVE

The objective of this policy is to explain the values which we have implemented as Doğan Group in the management of human resources.

2. SCOPE

As Doğan Group, we expect all our companies to act in accordance with our Human Resources Policy.

Our Human Resources Policy involves;

- a. the members of the Board of Directors of Doğan Group,
- b. managers and employees of Doğan Group,
- c. our affiliates and subsidiaries and their employees,
- d. 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 and Human Rights Policy.

3. TARGET

The basic objective of our group is to provide our employees with a peaceful and happy work environment and become an institution of which all its employees will be proud of being a part.

4. DEFINITIONS AND ABBREVIATIONS

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

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

4.2. Doğan Group refers to the Doğan Şirketler Grubu Holding A.Ş. and its affiliates, subsidiaries as well as its business partnerships

4.3. Senior Management refers to the Doğan Holding Executive Board, Chief Executive Officer, and C Level Managers (General Manager in case our associates are not represented by such high level management).

4.4. 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.

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

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4.6. Employee refers to Doğan Group staff.

4.7. Service Provider refers to the staff of the company which provides services to Doğan Group or the staff of the company for which the Doğan Group provides services (supplier, subcontractor, customer, etc.)

5. ROLES AND RESPONSIBILITIES

5.1. Board of Directors

The Board of Directors is responsible for determining the company management structure.

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.

5.2. Executive Committee

Human Resources Policy has been approved by the Executive Committee. The Executive Committee is responsible for preparing, developing, executing and updating this policy. It is also responsible for

- a. taking the necessary measures to ensure the compliance of its employees with the principles of this Policy,
- b. reporting the issues to the Internal Audit Department for the review of matters contrary to the Policy,
- c. taking the necessary measures to ensure the compliance of the external service providers and business partners with this policy.

5.3. Vice Presidency of Human Resources

The Vice Presidency of Human Resources is responsible for preparing, developing and updating this policy on behalf of the Executive Committee. The Vice Presidency of Human Resources reviews this policy, when necessary, in terms of its actuality and need for development and makes suggestions to the Senior Management.

The Vice Presidency of Human Resources is responsible for executing this policy and working to develop it, where necessary.

5.4. Doğan Group Employees

All Doğan Group employees are responsible for

- a. adhering to and complying with the Doğan Group policies, regulations and procedures,
- b. working in accordance with the legislation in force,
- c. reporting any conduct, activity or practice contrary to the policy to the Internal Audit Department.



5.5. 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

5.6. Directorate of Information Systems

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

5.7. Vice Presidency of Corporate Communication

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

5.8. 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. Doğan Holding Investor Relations Manager is responsible for publishing the prepared document on the company website.

6. PRINCIPLES OF IMPLEMENTATION

6.1. General Principles

The most important capital of our Group is human resources and accordingly our main objective is to become an organisation that our employees are happy and proud to be part of. We are aware that a sustainable growth is only possible with the employee engagement and for this reason we aim to grow our Group with colleagues who are quick, proactive and responsible and having strategic thinking skills. Doğan Group's Human Resources aim for offering a competent and high standard services to all his shareholders by supporting them in a quick, efficient and fair manner and being an integrative and strategic business partner. For that purpose, Doğan Group strives for and commits itself to;

- a. Creating a suitable environment where the employees can improve themselves individually and professionally,
- b. Providing a suitable workplace to ensure a sustainable development,
- c. Regarding the personal differences of our employees as richness in terms of human resources and showing a fair approach in line with our code of ethics,
- d. Evaluating the employee performance by measuring it with objective criteria,
- e. Providing equal opportunities to employees in terms of development and training,



- f. Offering assignment, transfer and rotation opportunities within the Group in order to enable employee development and the organisational development,
- g. Creating a work environment where the code of ethics and general code of conducts are applied, and the balance between the personal and professional life is maintained,
- h. Rewarding the high performance, providing right and constructive feedbacks to the ones who have lower than expected performance and supporting them to be improved,
- i. Developing approaches to strengthen the employee motivation and commitment.

We strive to create a culture of common sense and good judgement in human resources practices, where the code of ethics are observed, team spirit is prioritized, the engagement and creativity are valued.

The Human Resources Policy of our Group is based on employee and company objectives' overlap. Therefore, keeping corporate loyalty at high levels and having the corporate culture adopted and embraced by everyone has a great importance. We always give great importance to teamwork, loyalty to the company and corporate culture and our primary goal in the realm of HR is to have our employees be proud of corporate achievements as well as individual accomplishments. Our corporate culture is built upon ensuring our employees to establish fair, trustful, warm and appropriate relationships with the company and we regard integrity as the ultimate asset in our individual/company relationship.

All employees in our Group have equal rights. Personal differences of our employees, such as nationality, beliefs, ethnic origin, gender, disablement, political views and ages are regarded as richness in terms of human resources, and our employees are never judged for their personal differences.

As employees, we give great importance to internalize the code of ethics defined via in-house communication channels and training programmes and to act in this awareness.

6.2. Acquisition of Skilled Workforce to our Group

As Doğan Group, we adopt the principle of treating all the candidates equally, with no discrimination during the selection and hiring process, and looking only for the candidate's suitability for the job. As our Group adopts the belief that corporate success resides in practicing a successful recruitment strategy, its recruitment policy is based on candidates' educational background, experience, competencies, career goals and expectations in compliance with requirements of each position. We aim for acquiring to our Group, individuals who tend to teamwork, keep a close watch on national and global developments, open to innovations and suitable to our corporate culture.



6.3. Investing in Training and Development of our Employees

Creating and maintaining suitable opportunities with the purpose of maximizing our employees' potential and ensuring their continuous development is one of the main responsibilities of our Group. We give great importance to training in all levels with the intention of ensuring employee development. We adopt a culture which encourages learning and development in order to raise qualified and professional employees. We encourage our employees to have trainings which develop their personal skills and enhance our business with the purpose of increasing our Group's success and efficiency. In this respect, the HR identifies personal knowledge, skills and competencies of the employees and organizes several personal and vocational training programs in line with the employee needs. Personal training requests by employees are also responded to with that respect and are provided to them.

The training programs include, but are not limited to, personal development, technical, development management skills, legal issues, digital marketing and social media. Moreover, these training programs are backed up by corporate-specific solutions. In addition to technical training sessions, our Group organizes social training programs for employees to overcome stress-related difficulties of today's business world.

Training sessions on personal development and business-private life balance are welcomed by employees and support the team spirit and provide a more peaceful work environment in participation with all employees.

Our first objective is to create an educational environment where our current and potential leaders can continuously self-develop and the second is to bring up strong and respectable future leaders in order to meet our business targets. In this respect, we offer many training opportunities such as orientation trainings helping our newly employed leaders and/or future leaders to quickly adapt themselves to our corporate culture or leadership trainings for maximizing these competences. Besides, employees are offered the opportunity to pursue their graduate degrees in universities with discounts special to our company.

We believe that these implementations will increase our strength in terms of using technology, developing new business processes and being in the leading position in new markets.

6.4. Remuneration and Reward Management

Dogan Group adopts the "equal pay for equal job" principle. Our remuneration policy is set and updated according to salary scales, current market tendencies and performance evaluations.

As a fundamental principle, we apply competitive reward management and reward employee participation and success in order to acquire qualified employees and increase their loyalty. We believe that if our employees show a greater performance and exceptional achievements and/or offer better



performance than expected, it is an absolute necessary to reward them; and we believe these kind of rewards will ensure them to show an effort more than a standard job performance and encourage them to succeed.

7. RECORDS

The personal data of our employees is kept in compliance with the Law on the Protection of Personal Data No. 6698 and the Labour Law, as well as the Employment and Social Security legislation. We take the administrative and technical measures stipulated by the law in order to protect the personal rights and the interests of our employees, and we update, where necessary, the personal data of our employees in order to ensure data quality.

Records arising from the implementation of this policy are kept by the Human Resources. They may be obtained upon demand, where necessary.