



# DOĞAN GROUP

## OCCUPATIONAL HEALTH AND SAFETY POLICY



## 1. OBJECTIVE

Our Group cares for the health and safety of its employees. Our Occupational Health and Safety Policy shows how much we value our employees.

## 2. SCOPE

Our Occupational Health and Safety policy involves

- a. the members of the Board of Directors of Doğan Group,
- b. the managers and employees of Doğan Group,
- c. our affiliates and subsidiaries and their employees,
- d. the External Service Providers and their employees,
- e. persons and institutions (business partners) undertaking work on behalf of the Doğan Group companies including suppliers, consultants, lawyers and external auditors.

This policy

is an inseparable part of the Code of Ethics and Human Rights Policy.

## 3. TARGET

Our basic objective as Doğan Group is to

- a. provide a safe and healthy work environment for our employees and to minimize the labor loss and the risks associated with occupational health and safety,
- b. determine any possible risks beforehand and take the necessary risk minimization measures by completing the risk analysis studies in a timely and efficient manner,
- c. prepare Emergency Action Plans and ensure to keep them up-to-date,
- d. comply with the national and international laws and regulations and standards about work safety to which Turkey has acceded,
- e. constantly develop our practices regarding occupational health and safety in accordance with the job characteristics and obtain the necessary equipment,
- f. raise the awareness of our employees about the occupational health and safety by organizing a variety of training programs.

## 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

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- 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. Occupational Health and Safety Senior Board** refers to the authorized persons to be appointed by Doğan Holding Vice Presidency of Occupational Health and Safety and Vice President of Human Resources, the General Counsel or its representatives.
- 4.5. 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.
- 4.6. Name of the Document** refers to the topic of the document.
- 4.7. Employee** refers to Doğan Group personnel.
- 4.8. Service Provider** refers to the employee of the company which provides services to Doğan Group and/or which Doğan Group provides services to (supplier, subcontractor, customer, etc.)

## 5. ROLES AND RESPONSIBILITIES

### 5.1 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.

### 5.2 Executive Committee

Our Occupational Health and Safety Policy has been approved by the Executive Committee. The Executive Committee is responsible for preparing, enforcing and, where necessary, updating the policy and appointing the Occupational Health and Safety Senior Board members serving within the Group.

The Executive Committee is responsible for

- a. taking the necessary measures to ensure the compliance of employees with the principles of this policy,
- b. assessing any possible risks and their impacts,
- c. taking the necessary measures with regards to the proper establishment and enforcement of the control mechanisms to manage the determined risks.
- d. reporting to the Internal Audit Department for the review of matters contrary to the policy,
- e. taking the necessary measures to ensure the compliance of the external service providers and business partners with the policy.



### **5.3 Occupational Health and Safety Senior Board**

The responsibility for the establishment of a controlled work environment in accordance with the legal regulations related to occupational health and safety has been conferred on the Occupational Health and Safety Senior Board by the Executive Committee. The roles and responsibilities of the Occupational Health and Safety Senior Board must be put in writing and approved by the Executive Committee.

The Occupational Health and Safety Senior Board convenes every three months and also arranges Emergency Meetings where necessary.

### **5.4 Vice Presidency of Occupational Health and Safety**

Vice Presidency of Occupational Health and Safety is responsible for preparing, developing and updating this policy. The Vice Presidency Occupational Health and Safety reviews this policy, when necessary, in terms of its actuality and need for development.

Vice Presidency of Occupational Health and Safety is responsible for executing this policy and working to develop it, where necessary.

### **5.5 Vice Presidency of Human Resources**

Vice Presidency of Human Resources is responsible for organizing training sessions on occupational health and safety where it is appropriate or necessary for Doğan Group employees to act together as well as determining the personnel to participate in these sessions. Besides, as a member of the Occupational Health and Safety Senior Board, the Vice President of Human Resources is obliged to fulfill the duties and responsibilities required for this role.

### **5.6 Doğan Group Employees**

Doğan Group Employees are responsible for

- a. complying with the policies determined by the Executive Committee,
- b. effectively managing the risks associated with their own field of activity,
- c. working in accordance with external and internal regulations,
- d. reporting any conduct, activity or practice contrary to the policy to the Internal Audit Department.

### **5.7 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 or institutions

### **5.8 Directorate of Information Systems**

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



## 5.9 Vice Presidency of Corporate Communication

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

## 5.10 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.

# 6. PRINCIPLES OF IMPLEMENTATION

We give great importance to the health and safety of the employees within our group.

Ensuring the worker's health and safety in workplace is one of the priority objectives of our Group and the responsibilities on this matter are shared between all the departments from junior administratives to top executives. As employees, we show maximum effort to comply with the health and safety policies in order to ensure the workplace safety.

As per the regulations, occupational health and safety committees are active in Doğan Group's companies. Our committees are conducting works for measuring and enhancing the performance of the occupational health and safety management system.

We adopt as principle to comply with the legislative regulations in the matter of Occupational Health and Safety and we believe that the improvement of Occupational Health and Safety is a collective responsibility of the employees.

OHS Supreme Board monitors the group in terms of compliance with the OHS regulations and Doğan Group's OHS policy.

Our employees are responsible for notifying their managers immediately about the unsafe situations. By doing so, we encourage our employees to take responsibility for the safety of their workplace.

We perform risk analyses within our group's companies about this matter. We take measures to minimize the risks determined as a result of these analyses.

Our main objective is to ensure a safe workplace and safe working conditions by determining in advance the factors which may cause occupational accidents and diseases and thereby prevent the risks. We intend to reach "Zero Occupational Accident" target by constantly improving our Occupational Health and Safety culture and by setting goals such as encouraging participation from every levels of the Group to risk evaluation and risk level reduction activities.



We periodically organize Occupational Health and Safety trainings (mandatory attendance) in order to provide our employees with a safe work environment and raise employee awareness about Occupational Health and Safety matter. We aim to determining the new and current problems by periodically reviewing our training activities.

## 7. RECORDS

Records arising from the implementation of this policy are respectively kept by the senior management and the relevant managers and the Vice Presidency of Occupational Health and Safety and stored for 5 years.

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