

## AUDIO AND VISUAL MEDIA

# BROADCASTING PRINCIPLES

## Doğan Media Group:

## Our Shared Values

Doğan Media Group is a leading media provider offering exclusive, topical news stories, content and services that engage its audience in active dialogue and add value to their daily lives across all channel forms and at a global, 24/7 level.

Our “Shared Values” are the most important shared asset between publisher and employee, and constitute the foundation of our publishing principles. Our Shared Values also form the basis of the intangible yet critically important contract between Doğan Media Group and its readers, viewers and listeners.

We promise our readers, viewers and listeners a top-quality publishing activity – one that’s creative and in line with professional and ethical principles, and one that at times breaks the mold and traditions, but is ever-respectful of its audience.

### 1. Trust

Earning society’s trust through our general attitude and our audience’s trust through what we print and broadcast is our most important value. The very foundation of Doğan Media Group today, as well as in the future, is comprised of trust.

### 2. Independence

**a)** The independent nature of Doğan Media Group, its management and employees, is what forms the basis of the trust we have established in society as well as with our audience.

Doğan Media Group employees and management respect their professional position above and beyond any and all relationships based on interest and influence. They may not enter or partake in any activity or organization that could tarnish the Group’s, the Company’s or their own reputation, and should avoid any and all conflict-of-interest situations that would cast doubt on Doğan Media Group’s independent stance.

**b)** Among the most integral factors of the Group’s independence is the fact that the Doğan Media Group’s activities are built upon economic realities and prudent management principles. We will not engage in activities that do not create economic value. This is because an activity that is not economic in nature is simply dependent on yet another source.

c) We separate and identify commercial elements appearing in our publications, such as advertisements, commercial messages and sponsorship matters, in a manner that leaves no doubt as to the commercial nature of such elements. We exercise care to not use commercial brand names of companies and commercial product names, provided that such names do not constitute the main story. We do not publish or broadcast any content whatsoever that is based on any suggestion or advice received from advertising sources.

### 3. Accuracy and Truthfulness

a) The fundamental purpose of our publications is to relay facts to the public at large in an objective manner, without distorting, exaggerating or censoring said facts, and without being influenced by any external pressure or special interest groups along the way.

b) The element of speed should never overshadow truthfulness, and exaggeration and simplification should never stand in the way of the multi-faceted nature of truth. We should openly admit to what we do not know and make an effort to avoid speculation.

c) Our goal is to never mislead our audience knowingly and deliberately, while minimizing any misleading behavior that stems from a lack of information and diligence on our part, and take corrective action at the earliest possible moment.

### 4. Impartiality, Pluralism, Fairness

a) Our publications should be pluralist in a manner that reflects different aspects of the truth, and be impartial in the face of ideas that represent different sides of the truth and social actors. Impartiality and pluralism means considering our publications in their entirety and within a reasonable time span, and reflecting all mainstream ideas existing within society, without ignoring any such ideas within the confines of proportional fairness.

b) We aim to be open-minded and free of prejudice in the course of evaluating opinions and elements of proof that either defend or oppose an idea, attitude or behavior.

We must act fairly in the face of different opinions, ideas, attitudes and behavior. We must be able to place ourselves in the shoes of those that are different, and measure whether or not we have been acting fairly.

### 5. Compliance with Social Values

a) We live in a nation of many voices, within a society that is rapidly changing. We regard wealth in terms of the ideas, beliefs, attitudes and behaviors of our society, and consider it as a resource that feeds our publishing endeavor. We are respectful towards our democratic and secular system, and the Constitution and Laws that bind such diversity and wealth together.

**b)** We avoid publishing material that limits the freedom of speech, conscience and expression; is in violation of basic human rights; provokes hatred, brutality and animosity; fans hatred and animosity amongst communities and nations; and offends religious beliefs and sensitivities.

**c)** With regard to violence and criminal activity, we do not include details in our news stories that could a) adversely affect people, especially children, b) act as a motivational factor or c) divulge specific methods; this includes language and narration that glorifies violence in any publication that deals with violence and criminal activity.

**d)** We are mindful of the public's right to be informed and how this right must be carefully balanced against furthering terror propaganda in our publications dealing with terrorism. As such, we exercise care to not aggrandize the consequences of terrorist activities in an excessive and disproportionate manner, and we use language that is not ethnically discriminatory.

**e)** Our publications cover every aspect of global human life, and we are aware of the fact that this could at times prove to be disturbing, uncomfortable and/or regarded as out of place. While we engage in such reporting, we take pains to not cause deliberate harm to people – especially those groups that need special attention such as children, disabled people and minorities; and we avoid offending community values in an unnecessary, excessive and unjustified manner.

**f)** We abstain from defining individuals by their race, nation, social class, religious belief or lack thereof, professional group or physical or mental disabilities, as long as such elements are not an integral part of the story being reported, and we avoid creating a setting where such individuals could be subjected to mockery, belittlement, indignity or humiliation due to who or what they are.

**g)** We do not engage in “outing” a certain group or individual through various adjectives, assessments or methods, and render them subjects of hatred. We certainly and most definitely do not allow expressions that promote hate crimes.

**h)** We do not use monikers or references that mock or humiliate individuals and entities beyond the boundaries of fair criticism.

**i)** We are keenly aware of the fact that our audience expects that their children are protected. We exercise special care so that children and juveniles who appear in or constitute the subject matter of our publications and broadcasts are protected both physically and emotionally.

## **6. Right to privacy and protecting privacy**

**a)** Our publications respect the privacy of individuals. We do not disclose individuals' private lives, communications, correspondences or documents unless there is a compelling reason to disregard the requirements of the principle of privacy in order to serve the greater good.

**b)** We do not use an individual's lifestyle, attitude or behavior as a pretext to disclose their private life unless for the greater good.

**c)** We do not publish secretly-obtained images and sound recordings that violate the sanctity of privacy, or any recordings that violate the freedom of communication, unless required for the greater good, even if such recording was obtained through legal means.

**d)** We exercise care to not accuse any individual of actions that are considered a crime by the law unless concrete facts exist to that effect, or pronounce individuals and entities guilty as charged in the course of legal investigations unless proven so. We provide equal coverage to the prosecution and the defense, avoid impacting investigations in a negative manner, and take care to not influence our audience.

## **7. Transparency and accountability**

**a)** We are obligated to be accountable to our audience in every endeavor we undertake, starting with our publications. Owning up to our errors openly, if that is the case, and remedying such errors in the most expedient manner is our priority. We respect the right to respond and correct elements that are borne out of false stories and portrayals, and news and articles that infringe upon constitutional rights.

**b)** All publishing and broadcasting entities within Doğan Media Group take structural measures and establish mechanisms designed to avoid repetitive errors in printing and broadcasting, and facilitate prompt follow-up on the opinions and complaints stated by our audience.

## **8. Corporate dignity**

**a)** If it is the public's respect we strive to earn, we must first respect our own organization and colleagues.

**b)** Regardless of their position within Doğan Media Group, every employee exercises care to avoid behavior that would compromise the dignity of the company or their colleagues, or cause harm to the reputation of the companies under the Group's umbrella.

# AUDIO AND VISUAL MEDIA BROADCASTING PRINCIPLES

## Audio and Visual Media BROADCASTING PRINCIPLES

### Incidents Involving Law Enforcement, Legal Investigations and Court Proceedings

Crime and punishment deeply impact the community, while appealing to our sense of justice and individual curiosity. A process that starts with a crime, committed by either an individual or as a group, in the heat of the moment or in a premeditated fashion, and ends with the apprehension of the suspects, investigation of said suspects, trial and sentencing if the suspects be found guilty may constitute subject matter for all Doğan TV Group of Companies' products, ranging from news programming to serial TV shows.

#### Broadcasting value of crime

- The fact that a crime has merely occurred, and its potentially violent, surprising and fearful nature, does not necessarily constitute sufficient pretext for the crime to be covered in our broadcasting. In order for a crime to be covered in our broadcasts, we must first assess whether or not the crime:
  - Points out a shortcoming in security applications and measures, or a fault or insensitivity, whether deliberate or not.
  - Is connected to a security measure that needs to be taken, or legal regulations which need to go into effect.
  - Constitutes an open and ongoing threat in terms of public peace and safety.
  - Serves a social sensitivity/awareness.

#### When Airing Complex Criminal and Court Cases:

- The goal is to inform viewers and listeners correctly and completely at every step.
- None of the parties involved in such incidents and processes are allowed to influence the viewers and/or listeners.
- Language used by accusing entities is not mentioned/aired.
- No individual may be accused of actions that are considered a crime by the law unless concrete and convincing evidence exists to that effect.

- The fact that the identities of suspects may be used by other media outlets and that such identities may become common knowledge in the course of an investigation does not constitute sufficient pretext for using such identification information in Doğan TV broadcasts.
- Identification of suspects is only used in such cases where there is a clear public benefit in revealing their identities.
- As for active cases that are undergoing legal process, equal and fair coverage is provided for both the prosecution and the defense.
- No coverage may be aired that may lead to the revelation of identities of minors, or lead to the identification of minors through cross-references in criminal cases involving children, regardless of their involvement in such cases as suspects, witnesses or victims.
- Care is exercised in protecting the identity and reputation of the victim(s) and their family(ies) in cases of sexual violence such as sexual harassment, rape, etc.
- Identities of relatives, friends and associates of suspects, defendants and convicts may not be disclosed, even in the form of aliases, unless such persons are directly involved in the incident that is the subject matter of the news item.

### **Airing Criminal Incidents**

- In cases where a crime involves violence, visual material of such an act may not be used in detail, or in a manner that exploits or glorifies violence.
  - Gory, up-close images depicting the injured or the deceased may not be used. In cases where such footage cannot be cut out for the sake of the footage's integrity, such images must be masked.
- Details of a criminal act may not be reported and/or shown in a manner that may be mimicked by others, or in a manner that may encourage copycats.
  - The fact that an increasing amount of footage of criminal acts such as robberies, pick-pocketing, etc. has been captured by security cameras over the past years and may in fact be promoting crime, especially in those cases where the suspect(s) managed to get away, should be kept in mind.
- The fact that Doğan TV cameras may be invited, especially as the sole media outlet, to cover law enforcement practices such as raids, searches, location identification, etc. may lead to certain problems, such as violation of an individual's rights and the right to privacy, should be kept in mind.
- Department Managers must be notified prior to accepting the aforementioned invitations. Furthermore, Doğan's Legal department should be consulted as well.
- Activity footage recorded by law enforcement with their cameras may be used, provided the source for such footage is stated in a manner that leaves no room for uncertainty during broadcast.

- In order to record, playback and air an act of crime-in-progress for which information has been received in advance, approval from company management must first be secured.
- Since violence, injuries, and even death may occur before our cameras, airing live footage from a crime scene involves serious risk. Approval from the Department Manager must be secured as soon as possible in such cases, and company management must be notified.
  - In cases where the incident in question involves the taking of hostages and/or kidnapping:
  - Please remember that the perpetrators/kidnappers/hijackers may be watching our broadcast as a means of discovering law enforcement's preparations and plans.
  - Do not air phone calls from hostages or perpetrators/kidnappers/hijackers without your Department Manager's approval, and do not attempt to contact the hostages.
  - In instances where you are not airing certain information as per law enforcement's request, you must share this fact with your viewers/listeners.
  - Do not speculate as to the intentions or demands of the perpetrators/kidnappers/hijackers.

## Secret Recordings

It is paramount that the following must be adhered to in Doğan TV broadcasts:

- No recording obtained with the utilization of devices such as hidden cameras and hidden sound recorders may be used, and no methods such as monitoring electronic or traditional forms of communication, and unauthorized intrusion into computers or private property that may be construed as an invasion of the concerned party's right to privacy may be employed.
- Secretly obtained images and sound recordings that violate the sanctity of privacy, even if such recordings may be a part of legal documents, may not be aired.
  - Recordings made with non-standard equipment such as hand cameras and cell phones, where it is made to look like the individual shooting the footage is not a reporter, also falls under these rules.

Information, documentation, sound or images obtained by employing such methods may only be used for:

- Revealing an act of crime, fraud or injustice.
- Revealing a significant shortcoming or act of negligence on the part of those responsible for a certain incident.
- Protecting public health and public safety.

- Cases where there is an element of obvious public benefit, such as revealing information that will help people make a more informed decision in matters that concern the public.
- Cases where it is clearly impossible to obtain such information, documentation, sound or images through any other means..

Cases in which the Legal department is consulted for their opinion and the approval of company management is secured.

- Types of programming where images of individuals are secretly recorded and edited within the confines of a certain storyline, such as “Candid Camera” shows, and written consent of those whose images are recorded is obtained before broadcast.

## Terrorist Incidents

Terrorist incidents deeply impact society as well as the national agenda, regardless of their magnitude and consequences.

News stories, broadcasting and programming covering terrorist incidents

- should exercise caution to not further the propaganda of terrorist organizations while watching out for the public’s right to receive speedy, informed and comprehensive news.
- Comments on political and social aspects, as well as the underlying reasons for the incident, should not legitimize terror.

### Airing terrorist incidents

- Necessary care should be taken to not portray terrorist activities and their consequences in an excessive, larger-than-life manner.
  - It should be kept in mind that displaying a “Breaking News” banner announcing a terrorist incident for an excessively long time on- screen exaggerates the length of said incident.
- Terms and titles that assign an official identity to terrorist organizations, such as “commander”, “brigade” and “people’s court”, should not be used. Also, indiscriminate and excessive use of visual material related to terrorist organizations must be avoided.
- Information on terrorist incidents that appears in social media, on video sharing platforms, and in statements by individuals at the scene of the incident must be examined with particular care and should not be used without verifying such material within a reasonable timeframe.
- The identity of a group claiming responsibility for a terrorist incident may only be aired with the approval of channel management.
  - Generally, the mere fact that a group claims responsibility does not constitute sufficient pretext for an on-air announcement.



- As a rule, tips and information received on incidents such as bomb threats, illegal demonstrations, hijacking of land, sea or air vessels, hostage-taking actions, etc. may not be aired on TV before such incidents are verified by the authorities.
  - Company management's approval must be secured in order to report tips and information that has not yet been verified by the authorities as news.
- Doğan TV employees must comply with the instructions of the authorities at the scene in the case of an incident, skirmish or disturbance connected to terrorist activity.
  - In the case that such instructions are perceived as misleading in nature, or are otherwise illegal or inappropriate, the Department Manager must be informed. He/she may ultimately decide to share the problem with viewers/listeners, and/or ask the employee to leave the scene of the incident, as he/she sees fit.
- As is the case in other incidents, the identities of those who have died in terrorist incidents may not be aired before their respective families are duly notified. News coverage of funerals should be carried out in an even-tempered manner that does not elevate human suffering and lead to new emotional trauma.
- Cautionary measures and limitations regarding terrorist incidents cover not only news and daily events programming, but any and all fictional work as well.
- Our broadcasts must not disrupt salvage and rescue efforts in any manner, and must not prevent the authorities from carrying out their duties.
- We must take into account that the victims of disasters, particularly those who have lost loved ones, will experience shock, and that their reactions might be unpredictable. Also, we must respect the privacy needs of those in mourning.
- As the scope and impact of disasters increase, the sense of helplessness in people is heightened. In order to be able to balance such feelings of helplessness, we must ensure that our broadcasts reflect positive outcomes and good examples in terms of struggling against disasters in a proportionate manner that is not exaggerated.
- It is a fact that in cases of disaster or extraordinary incidents, interest in the media is temporary. As Doğan TV, we must maintain our interest until the incident has passed and the wounds incurred by the disaster have significantly healed, and we must be a media leader in this respect.

### **Politics, elections, political polls**

Politics is a basic component of society and constitutes the topic of many broadcasts on Doğan TV channels, from programs to news bulletins. Politicians and political commentators frequently appear on our programs as public personas and media stars. Our Sales Values -- mainly the principles of "Impartiality, Pluralism, Fairness" -- should be complied with in a sensitive manner, particularly on programs of a political nature and content.

## **Programs of a Political Nature**

Aside from routine political activities and short interviews conducted without special arrangements, employees must inform company management before inviting a country leader, political party leader or Minister to a broadcast program.

Employees must inform company management when such persons request to take part in a program or issue a response to a broadcast concerning them.

Politicians are not paid in return for participating in our broadcasts. However, as long as they are not participating as the official representative of a party or institution, their obligatory expenses such as hotels and travel may be covered.

## **Programs Where Political Matters are Not Normally Covered**

Employees must inform company management before inviting any politician or senior public officer to a program.

If an employee invites a politician for his/her non-political expertise or skills, or merely for his/her public reputation, we must take care that this does not upset the balance in our programming and does not offer an undue and disproportionate advantage to the invited politician.

## **Election Broadcasts**

Doğan TV Group of Companies conducts its election broadcasts as per the relevant provisions stipulated by Law No. 6112.

The expected behavior of Doğan TV employees during the election period is covered in the section "Obligations of Employees/Taking Part in Public Life/Political Activities".

## **Polls of a Political Nature**

It is essential that election polls conducted by others must be monitored carefully when broadcasting during the election period.

The Holding's management decides whether the channels of the Doğan TV Group of Companies will conduct polls, mainly election polls, and what polling company/companies it will use.

When polls of a political nature conducted by others are broadcast, we must pay attention to the principle of impartiality and make every effort to present the opinions of all relevant parties. The name of the institution that has conducted the poll, upon whose demand and financing the poll was conducted, its polling method, the number of persons interviewed and the demographic breakdown must be clearly specified during the course of the program.

The date(s) of the site study and whether there were any incidents that might have affected the outcome on such date(s) must especially be stated.

When the outcomes of "polls" based on voting through websites or SMS services are used, the methodology in particular must be clearly indicated. Such polls should not be used in terms of the party preferences of voters. It should be taken into account that in sensitive and

controversial matters, organized pressure groups can seriously affect the outcomes of such polls.

Not broadcasting a poll that has been conducted for airing, or making demands of the relevant source with the promise of the poll being broadcast, may have many drawbacks. This situation may be interpreted as the poll's outcome not corresponding to or matching the assumed views and expectations of Doğan TV management. The decision to not broadcast the poll must have a comprehensive and legitimate explanation.

## **Incidents Requiring Changes in Program Flow**

Program flow is a promise to our viewers and commercial stakeholders. Our viewers expect to see the program flow we have announced. After any change in the flow, including breaking news bulletins, it is essential to return to the announced program flow as soon as possible.

A permanent change in program flow can only be considered in case of extraordinary situations such as a national disaster (or an international one affecting Turkey). Other exceptions include the death of a national leader, war, or a declaration of national mourning.

It should be taken into account that with regard to incidents which partially affect the country and the course of life, the idea of a national channel changing its program flow may create an impact in the public's eye that is much bigger than the real effect of the incident.

Decisions regarding a change in program flow are made exclusively by the management of the Doğan TV Group of Companies.

### **Previews**

In cases where a scene that has appeared in any broadcast or production and which has passed in the course of the flow or is perceived as natural in the dramatic context is used as a preview, it must be taken into account that it will be repeated for day(s) and that it may reach viewer segments that are different than those targeted.

This situation may lead to such scenes being perceived in different ways, and its effect will greatly increase.

# THE OBLIGATIONS OF DOĞAN TV HOLDING EMPLOYEES

## Representing the Institution

Each and every employee of Doğan TV Group of Companies must remember, primarily during his/her business life but also in his/her personal life as well, that he/she is a member of the most important media institution in Turkey. .

Each and every one of us should be aware of the fact that even if we do not wish, or intend to do so, we may be perceived as representatives of the institution through our words, actions and behaviors.

- In all news bulletins, broadcasts, programs, footage, activities, business relations, Internet and social media communications, Doğan TV employees must indicate their corporate identities and positions in a clear and comprehensible manner.
- If there is a viable threat to the security of the employee, the employee may conceal his/her identity with the approval of his/her Department Manager, and may remove company logos on his/her vehicle and equipment.

## Reputation of the Institution

We expect our colleagues to take into consideration and protect the reputation of the Holding, the entities thereof, and all employees thereof. Accordingly, Doğan TV employees are obliged to do the following:

- Not share what they know, have heard or have seen related to our businesses, projects, and business plans with persons outside the Holding or in the general public, through any means.
- Take into account the institution's reputation when conducting business or personal relations with their colleagues.
- In cases of disputes with colleagues which may have a legal aspect, employees should first resort to the opinions and if necessary the arbitration of the Human Resources and/or Legal departments.
- Not state positive or negative opinions about our competitors unless it is their professional duty to do so.
- Not promote our competitors in any way.

## The Institution's Priority

We operate in a field which is founded on and whose biggest value is creativity. Thus, it is our priority to assess the creative ideas and projects of our employees in the best, most realistic and fairest manner possible. In exchange, our employees are obliged to share their creative ideas

and projects first with their executives, and then if necessary with the relevant departments of Doğan TV Group of Companies.

- If Doğan TV employees think that their creative ideas and projects are not being assessed fairly, they may apply to the next senior position above Department Manager.

Doğan TV employees may share their ideas and projects with external entities only after he/she is expressly informed in a reasonable timeframe that the ideas and projects they have developed as required by their work position will not be assessed/made use of within the Doğan TV Group of Companies.

Even if they are approved, non-business activities may not prevent the employee(s) from fully and effectively fulfilling their duties within Doğan TV and from devoting their full energy during business hours to Doğan TV (See the “Non-Business Activities” section for the approval process).

## **Conflicts of Interest and Non-Business Activities**

### **Gifts**

Doğan TV executives and employees may not accept any gifts which are geared towards, or which give the impression of being geared towards, affecting their judgment, integrity or impartiality.

- Gifts high in monetary value, such as securities and investment shares, are included in this scope.
- The following courtesy gifts may be accepted, provided that they are presented to almost everyone who is in similar business relations with the gift-giving party: gifts of small monetary value; gifts intended to have a keepsake value; tickets for entertainment, art or sporting events; invitations to meals; invitations to receptions such as memorial ceremonies or award ceremonies; and invitations to charity functions, etc.

### **Invitations and Trips**

It is essential that a Doğan TV employee’s travel expenses for broadcast, program, and news purposes are covered by their respective company and not by an external party.

- The following are deemed as exceptions:
  - If the task can only be achieved by using special accommodation or travel means -- for instance, if your only chance to interview a businesswoman is aboard her private jet.
  - If it is only possible to reach the destination by special means -- for example, if you could barely find a seat on an airplane to a disaster zone.

- If not utilizing the special travel or accommodation means provided to you will deprive you of opportunities your competitors will have access to -- for instance, not traveling to an away game on the team's aircraft.
  - If it is not possible to determine the commercial value of the special means you will utilize -- for example, flying on the trial run of a new commercial aircraft.
  - Being invited into the special vehicles or residences of presidents, heads of government or important leaders.
- Joining trips by invitation is subject to the permission of company management. In this case,
    - Also, the organization extending the invitation must not be given any assurances that the trip will be mentioned in a broadcast.
    - If a program *will* be broadcast after the trip, the person who travelled by invitation and the name of the inviting organization should be specified expressly and clearly.

## Non-Business Related Activities

Without the prior written consent of company management, Doğan TV employees may not carry out commercial activities, may not deliver services for other entities or persons, and may not assume responsibilities for other entities. Institutions working for the public good, sports clubs, associations related to education institutions, hobby organizations and professional organizations such as lawyers' bars and chambers *are not* included in this scope.

- Offers to act in works such as movies/TV series/plays other than amateur works, paid speeches, consultancy, assuming a role as a spokesperson, promotions, introductions, or being the face or the voice of ads or commercials *are* included in this scope.
- In the case of such offers, before giving an answer employees must notify his/her Department Manager and the Corporate Communications Director of his/her company. Such offers must be approved by company management.
  - The demands of Doğan TV employees who wish to regularly comment via broadcast in any medium, including the Group companies, shall be assessed within this scope.
  - If persons contributing to Doğan TV broadcasts externally but on a regular basis have financial interests or affiliate relations in the area covered by the broadcasts and programs they contribute to, it is our obligation to inform our viewers and stakeholders of this fact.
  - The relevant Group company shall fulfill this obligation in such a way as to ensure that it is understood and accessible in the easiest manner.

## Invitations to Make Speeches and Similar Personal Engagements

Doğan TV employees, particularly on-screen faces, are frequently invited to conferences and meetings as speakers or moderators/presenters.

When such invitations are being assessed, it must be taken into consideration that our credibility and reliability before the public is very important.

It is essential that attending such meetings does not create an appearance or a perception which would taint our impartiality, objectivity or corporate reputation.

Before accepting a speaking invitation, inform your Department Manager and your company's Corporate Communications Director.

If a Doğan TV employee takes part in activities:

- Which are financed by associations, entities, organizations, companies, groups or persons which may constitute the subject matter of news bulletins, broadcasts or programs,
- such as meetings and conferences whereby the attendance is restricted to the members of a cause, party, lobby, etc., in return for donations, the employee must obtain the approval of company management before accepting the invitation.

To a reasonable extent, travel expenses such as tickets, hotel expenses, meals, etc. may be accepted from entities from whom it is ordinarily not suitable to receive money.

### **Interview Offers and Broadcast Invitations**

Doğan TV employees are obliged to inform their company's Corporate Communications Director before responding to any and all kinds of invitations for interviews, or appearances or being a guest, on a broadcast program.

If the subject of the interview or program is related to the employee's duties within the Doğan TV Group of Companies, or related with the activities of his/her company or the Group, the approval of the Corporate Communications Director is required.

### **Economic Interests and Financial Investments**

Employees' financial activities and investments are the areas with the highest amount of problems in terms of potential conflicts of interest. The position of Doğan TV Group of Companies as Turkey's leading media institution may lead to an inappropriate image even due to the most innocent investment decisions, and may pose difficulties for the Group.

No matter how good their intentions are, Doğan TV executives and employees must do their best to abstain from any and all financial activities which may have the possibility of arousing suspicion.

Furthermore, as Doğan TV Group of Companies is an important affiliate of the public Doğan Group, it has certain responsibilities with regards to the relevant regulations of the Capital Market Board. Accordingly:

- Within the scope of the news programs, broadcasts and programs they produce, Doğan TV employees may not for investment purposes use any information that they acquire about a company that is listed in the stock market which may affect the value of the company, and they may not share such information with persons who will use it or who will likely use it for that purpose.

- Doğan TV employees and family members may effect transactions on Doğan Group shares (Doğan Group of Companies and Doğan Yayın Group of Companies) only upon notifying Doğan TV Group of Companies' senior management and obtaining their approval. Any transactions to be effected may absolutely not be short-term transactions (i.e. less than one year). Before approval, the Holding's senior management will assess whether the transaction could be considered insider trading (as referred to in the relevant decree of the CMB); in other words, whether information that is not yet public is used in favor of the person making the notification or to offer interest to third parties.
- Such restrictions do not cover mutual funds, index funds traded in the stock market, the shares of companies not operating in Turkey, and fixed revenue investment instruments.

## **Taking Part in Social Life**

Doğan TV Group of Companies supports its employees' fulfilling their responsibilities as citizens and working for vocational organizations and charity events within the framework of corporate responsibility. Doğan TV Group of Companies does not restrict the personal rights of its employees.

However, it is also our priority to protect the corporate identity of Doğan TV Group of Companies, and the impartiality and the credibility of our broadcasts.

### **Political Activities**

- Doğan TV employees may not work for a political party or a candidate, may not initiate/support campaigns, and may not take part in any such promotional activities.
- Editorial staff and on-screen faces may not donate to political parties or candidates.
- Particularly, those employees who write, inspect or produce political news stories must be aware of the fact that even the slightest impression of political affiliation will mar the impartiality and credibility of Doğan TV Group of Companies and its channels.
- Editorial staff and on-screen faces are expected to not wear symbols related to political campaigns; to not use political stickers on their personal vehicles; to not post political signs in visible areas of their homes; and to not attend political meetings or support meetings.

### **Attitude Towards Controversial Matters**

- A Doğan TV employee who takes a clear, public stance on a controversial matter should be aware that s/he is endangering his/her impartiality on the matter.
- All editorial positions and on-screen faces, including presenters, correspondents, producers, script writers and guest coordinators, must be careful to abstain from partisan behavior and not be perceived in such a way as to favor one side in controversial matters, on or off-air.
- If Doğan TV employees are providing opinions about a matter unrelated to their duties and jobs (for instance road construction in their district, caring for stray dogs, etc.), it should be



clearly specified that such opinions do not reflect the opinions of Doğan TV Group of Companies.

- Doğan TV employees who wish to assume a regular and active role in a controversial matter outside the workplace must first obtain approval from company management.

### Charity Work

Before taking part in the promotion of charity institutions, announcements for the public good, invitations and meetings for charity purposes, charity publications like Teleton, and similar activities, Doğan TV employees -- particularly on-screen faces – must inform their company's Corporate Communications Director, since the approval of company management is necessary for such activities.

## Appearing in Social Media

Social media networks represent the fastest developing realm in the communication world. Networks such as Facebook, Twitter, LinkedIn, Flickr, YouTube and others represent a very important place in the daily lives of millions of people, and are very influential from a social and political perspective.

As Doğan TV Group of Companies, we regularly use social media networks to communicate with our viewers, gauge their reactions and comments, and to be inspired from time to time.

Many employees also take part personally in social media networks. Some use these networks quite often. It is very natural, particularly for on-screen faces, to be very influential and to be highly followed on social media.

Doğan TV employees are obliged to conduct their personal activities on social media networks without tainting both their corporate identities and Doğan TV Group of Companies' reputation.

In order to not encounter any problems in this respect, please be aware of the following:

- Be transparent in social media networks. Do not hide your identity and do not use pseudonyms. Clearly state your position with Doğan TV.
- Bear in mind that all Values, Practices and Obligations covered by these Guidelines are also applicable to your social media activities.
- Do not share any information, intelligence, documents, news, images, footage, etc. you are working on or that you receive until the material is assessed and used by your channel.
- Do not say or show anything you would not say or show on your own channel.
- Do not share private information about Doğan TV Group of Companies internal processes, or those of your own company. Do not engage in business-related discussions with your colleagues on social media.
- When you are sharing, forwarding or responding to information, opinions, or images received from other users, please ensure they are not perceived as your own opinions. Show sources

and provide links. If you notice that information you have shared or forwarded is wrong, promptly correct it with a follow-up message.

- Do not forward any material from our competitors.
- Be cautious when providing opinions about persons or entities. In particular, try not to victimize.
- Even if they are in the form of insinuations, do not share insulting or belittling expressions that extend beyond the boundaries of criticism and could offend a part of society or society as a whole.
- Remember that what you post in social media networks may be forwarded to others by third parties, and that your posts may be taken out of context.

# PRACTICE AND INSPECTIONS

## Viewers' Representative

### Duties and Responsibilities

- Viewers' Representatives are appointed by the Doğan TV Board of Directors. The term of duty shall be determined at the time of appointment.
- Viewers' Representatives' duties may be terminated through a resolution of the Doğan TV Board of Directors. If the Viewers' Representative is already appointed to other duties within the Group, the termination resolution shall not affect such other duties.
- The duties of the Viewers' Representative may not be terminated for fulfilling the responsibilities and powers set forth herein.

### Responsibilities

- Viewers' Representatives are responsible for the following:
  - Implementing the Doğan Media Group Shared Values and Doğan TV Group of Companies Broadcasting Practices on the website, mobile applications, and social media applications in the course of company activities;
  - Ensuring that Doğan TV Group of Companies employees fulfill their Obligation;
  - Following up with and assessing comments and complaints received from viewers.
    - Viewers' Representatives, carrying out their duties within the Doğan TV channels as set forth in Article 22/1 of Law No. 6112, also report to the Viewers' Representative aligned with company management.

### Method of Operation and Powers

- Viewers' Representatives shall directly intervene:
  - In cases where their opinions are requested during the preparation and production stages of any and all types of broadcast, such as news programs, debates, programs, series, contests, etc.
  - If they deem it necessary based on matters they have learned about, through their own observations or other means.
    - If it is deemed necessary to obtain the opinion of the Viewers' Representative, it is best to do so as early as possible in the preparation/production stage.
    - Producers, Executive Producers, Editors, News Directors and all senior personnel, at every stage of the broadcast, must not prevent the demands of department employees to obtain opinions from the Viewers' Representative.
- Viewers' Representatives shall regularly stay abreast of the management efforts of the channels and companies within the Group [via weekly or seasonal meetings, inquiry meetings, etc.].
- The Viewers' Representative shall
  - assess any and all activities of the Doğan TV Group within the scope of Shared Values and Broadcasting Practices
  - and relay his/her opinions to the relevant company's management if s/he believes that the Shared Values and/or Broadcasting Practices have been violated.
- In case there are irreconcilable differences between the opinion of the Viewers' Representative and the preferences and practices of the company management, the Doğan TV Chairman's opinion and decision shall be sought.
- The Viewers' Representatives' assessments and opinions may not replace a legal inspection. In cases where there are potential legal ramifications, the opinions and approvals of the Legal department must be obtained as quickly as possible.
- With the approval of the Chairman, the Viewers' Representative shall regularly and in a transparent manner share with Doğan TV employees, and if necessary the public, the applications s/he has included in his/her agenda, his/her own assessments and decisions, the comments and complaints received from viewers, and all relevant responses.

## **SANCTIONS**

- These Guidelines constitute a part of the contract between Doğan TV Group of Companies and its employees.
- New recruits are informed of the Doğan Media Group Shared Values and Broadcasting Practices, as well as the Obligations of Employees. It is explained to new recruits that they must comply with these values and principles when working and doing business.

- The expression “employees” shall cover all employees subject to Labor Law No. 4857 and Press Labor Law No. 5953 which apply to all legal entities operating under Doğan TV Group of Companies A.Ş.

- Persons/entities offering broadcast-related content services to Doğan TV Group of Companies A.Ş. and its affiliates, and those working within the scope of copyrights or making programs as producers, are hereby also subject to the Shared Values and Broadcasting Practices covered in these Guidelines, and shall be informed that the services they deliver must be in line with the measures set forth in the Guidelines.
- Throughout their continued efforts with Doğan TV Group of Companies and its affiliates, and at all times after the termination thereof, our business partners agree not to disclose to third parties the matters, financial status, secrets, activities, agreements, affairs or any other confidential information they are in possession of or which they learn during the course of their relationship with Doğan TV Group of Companies, or any and all kinds of payments they receive; and not to make any adverse statements or disclosures about Doğan TV Group of Companies and its affiliates which are unjust and which could taint the Group’s commercial reputation.
- Intentional violation of the Shared Values and Broadcasting Practices and employees not complying with the Obligations in a conscious and dedicated manner may be subject to sanctions ranging from warning notices to employment contract termination.
- The Doğan TV Discipline Committee will decide on the applicable sanction(s).
- Errors and mistakes committed during broadcasts are corrected in the most express manner, and apologies are made if necessary.
- The right to respond and correct is respected in cases of misinformation or defaming/disparaging comments made about persons and entities.
- Viewers are given swift and satisfactory responses to their comments and complaints.

# LAWS AND REGULATIONS

## LAW ON THE ESTABLISHMENT OF RADIO AND TELEVISION ENTERPRISES AND THEIR MEDIA SERVICES

Law No: 6112

Date: 15/2/2011

Official Gazette: Date: 03/03/2011 No:27863

### **The Independence and Liability of the Media Service Provider**

**ARTICLE 6 –** (1) The contents and transmission of media services cannot be interfered with beforehand and the contents cannot be audited prior to transmission.

(2) Provisions under this Law, under other laws and in international legislation that Turkey is a party to; and regulatory actions issued by the Supreme Council pertaining to the application of the said provisions shall not be deemed as interference.

(3) Media service providers are obliged to ensure non-use of any media services in such a way as to gain unfair advantages, whether by themselves or by their shareholders, or by any blood and in-law relatives up to and including the third degree and for any other real person or legal entity.

(4) Media service providers are liable for the content and presentation of all media services that are broadcast, including commercial communication and third-party productions.

(5) Media service providers are obliged to offer their identification details, contact addresses, and the name and contact details of their Viewers' Representative to the Supreme Council and publish this information on their website under the procedures and rules established by regulation.

(6) Media service providers may not broadcast cinematographic works beyond the period agreed with the rights holder.

### **Broadcasts in Times of Crisis**

**ARTICLE 7 –** (1) In times of crisis caused by war, terrorist attacks, natural disasters or similar extraordinary circumstances, the freedom of expression and information is fundamental. Broadcast services cannot be audited beforehand, and decisions of the judiciary being reserved cannot be ceased. However, in situations required by national security or in situations in which it is highly likely that public order will be seriously disrupted, the Prime Minister or the minister to be appointed by the Prime Minister can impose a temporary ban.

(2) The media service provider is obliged to broadcast any announcement in relation to the requirements of national security, public order, general health and general morality issued by the President or the Government before 23:30 on the day of arrival of any such announcements.

(3) Any cancellation lawsuits to be filed against decisions taken pursuant to paragraphs one and two shall be directly brought before the Council of State. The Council of State shall hear these lawsuits, render its decisions with priority, and decide on stay of execution requests within forty-eight hours.

## CHAPTER THREE

### Media Service Principles

**ARTICLE 8** – (1) Media service providers shall provide their media services in line with the following points, and with an understanding of public responsibility.

Media services:

- a) Shall not violate the existence and independence of the State of the Republic of Turkey, the indivisible integrity of the State with its country and nation, or the revolutions and principles of Atatürk;
- b) Shall not inflame society to hatred and hostility by discriminating on the basis of race, language, sex, class, region, religion and sect, nor shall they form hatred within society;
- c) Shall not act contrary to the rule of law and the principle of justice and impartiality;
- d) Shall not act contrary to human dignity and the principle of personal privacy, and shall not include humiliating, derogatory or defamatory expressions against persons and entities/organizations, beyond reasonable criticism;
- e) Shall not praise or encourage terrorism, depict terrorist organizations as powerful or rightful, or portray terrorist organizations' intimidating and deterrent qualities, and shall not present an act, perpetrators or victims of terrorism with the form of serving the interests of terrorism;
- f) Shall not contain and encourage broadcasts which discriminate on the basis of race, color, language, religion, nationality, sex, disability, political or philosophical views, sect or similar reasons, and contain and encourage broadcasts which humiliate persons;
- g) Shall not act contrary to the national and moral values of society, general morality and the principle of family protection;
- h) Shall not praise commission of crime, criminals, criminal organizations or teach criminal techniques;
- i) Shall not condone child abuse or abuse of powerless and disabled people, or incite violence against them;
- j) Shall not encourage the use of addictive substances like alcohol, tobacco, narcotics and gambling;
- k) Shall predicate on the principles of impartiality, truthfulness and accuracy and not impede the free formation of opinions in society. News that can be investigated pursuant to the professional principles of the press shall not be broadcast without investigation or verification; shall not provide exaggerated sounds and images, nor any effect or music other than natural sounds during broadcast. Archive or re-enactment images shall be indicated as is, and the source of news obtained from agencies or other media sources shall be stated;
- l) Shall not present or declare anyone as guilty unless conclusively proven guilty by a judicial decision; shall not be in the form of affecting the trial process and impartiality other than being newsworthy during the judgment process in cases that have been passed to the judiciary;
- m) Shall not contain any elements that cause unfair competition or serve unfair interests;
- n) Shall not be biased towards or display favor for political parties and democratic groups;
- o) Shall not encourage acts that jeopardize the general health and/or protection of the environment and animals;
- p) Shall ensure that Turkish is used correctly, well and comprehensibly without undermining its characteristics and rules; shall not make crude, inferior and slang use of the language;
- r) Shall not be obscene;
- s) Shall respect the right of people and institutions/organizations to reply and rectification;
- t) Shall not present contest or lottery information via communication media, and no prizes shall be awarded to listeners or viewers; nor shall they act as an intermediary for awarding of prizes;
- u) Surveys and public opinion polls that have been arranged or commissioned by the media service provider shall take place before a notary public, from the preparatory stages until the announcement of results;
- v) Shall not exploit people by way of fortune telling or superstitions;
- y) Shall not contain programs that are contrary to social gender equality, encourage pressure/oppression towards women or exploit women; and
- z) Shall not encourage or inure violence.

(2) In radio and television broadcasts, any programs which could impair the physical, mental, or moral development of young people and children shall not be broadcast within the time intervals in which they may be viewing, and without a cautionary/protective symbol.

(3) On-demand media service providers shall ensure that the provision of media services which could adversely impact the physical, mental or moral development of young people and children will be conducted in such manner that under normal circumstances they will not hear or see such services.

## **CHAPTER FOUR**

### **Commercial Communications in Media Services**

#### **General Principles**

**ARTICLE 9** – (1) Commercial communication must be audibly and visually easy to distinguish from other elements of the media service.

(2) Subconscious techniques shall not be used in commercial communication.

(3) Surreptitious commercial communication shall not be permitted.

(4) The images or voices of people who regularly present news bulletins and news programs shall not be used in commercial communications.

(5) Commercial communication shall not be used in such a way that will affect the editorial independency of the media service provider or the program content.

(6) Save for the fundamentals and principles provided for under Article 8, commercial communication:

- a) Shall conform to the principles of justice, equality and honesty;
- b) Shall not include or encourage any discrimination on the basis of sex, race, color, ethnic origin, nationality, religion, philosophical beliefs or political ideas, disability, age or any other type of discrimination;
- c) Shall not be misleading and shall not harm consumers' interests;
- d) Shall not be harmful to the physical, mental and moral development of children; shall not directly orient them to purchasing or renting a product or service by means of exploiting their inexperience and innocence; shall not directly encourage them to convince their parents or others to purchase the advertised product or service; shall not abuse their trust with teachers and other people; and shall not display children in dangerous situations without good cause;
- e) Shall not be oriented towards the exploitation of women; and
- f) Shall not encourage behavior that will compromise health, safety or the environment.

(7) Commercial communications for food and beverages containing food and other substances that are not recommended to be excessively consumed in general diets shall not be broadcast alongside children's programs or within these programs;

(8) The volume level of broadcast commercial communications shall be the same as that of other broadcast parts.

### **Advertising and Tele-Shopping in Television and Radio Broadcast Services**

**ARTICLE 10** – (1) Advertisements and teleshopping present in television and radio broadcast services shall be arranged in such a way that it can be clearly discerned and easily distinguished from other elements of the program service, via an audio and/or visual announcement.

(2) The rate of all broadcast advertisements, other than tele-shopping broadcasts, cannot exceed twenty per cent of a broadcast from the start of an hour up to the start of the next hour.

(3) The time allocated for program sponsorships and promotions of the broadcaster's own program and product placements shall not be included within the rates stipulated in paragraph 2. The rate of program promotions cannot exceed five percent of a broadcast from the start of an hour up to the start of the next hour.

(4) Tele-shopping can be broadcast for at least fifteen minutes continuously, being indicated with a clear audio and visual alert, independent from the time limits determined in paragraph 2. The total time for this type of broadcast shall not exceed one hour per day.

(5) Public service announcements, which are broadcast for free and recommended by the Supreme Council, are not included in advertisement periods.

(6) Advertisements and tele-shopping broadcasts may be placed between programs or in a program in such a way that they will not harm the integrity or value of the program, or the rights of the right owners. In programs that are comprised of independent parts, i.e. sport programs that have half-time periods, and similar types of event/show programs, advertisement and tele-shopping broadcasts can be placed between these parts or into half-time periods.

(7) Films that have been made for cinema and television, as well as news bulletins and children's programs may be interrupted with advertisements and tele-shopping one time for each thirty-minute broadcast period, if the planned broadcast period is longer than thirty minutes.

(8) Under no circumstances can advertisements and tele-shopping be placed within religious ceremony broadcasts.

(9) These provisions are not applicable to television and radio broadcast services devoted exclusively to advertisement, tele-shopping and self-promotion.

(10) Other matters concerning the implementation of this Article will be regulated by the Supreme Council on an as-needed basis.



## **Commercial Communication of Certain Products**

**ARTICLE 11** – (1) Commercial communications for alcohol and tobacco products is not permitted in any way.

(2) Commercial communications cannot be made for pharmaceuticals and medical treatments subject to prescription.

(3) Advertisements for pharmaceuticals and medical treatments that are not subject to prescription shall be prepared under the principle of integrity, and in such manner that they are comprised of elements that reflect the truth and can be verified.

(4) Tele-shopping is not permitted for pharmaceuticals and medical treatments.

## **Sponsorship**

**ARTICLE 12** – (1) If a certain program is partially or wholly sponsored, this fact shall be specified at the beginning of the program, with appropriate expressions upon entry and exit from advertising breaks both within the program and at the end of the program. In program promotions, no reference can be made to the program's sponsor.

(2) In sponsored programs, the sponsor's or a third party's goods and services shall not be referred to; and purchase, sale or lease of these items shall not be promoted.

(3) Programs may not be sponsored by real persons or legal entities that engage in producing or selling goods and services banned from commercial communication. If real persons or legal entities that produce, market or sell medical products; or market or offer medical treatments sponsor a program, the name, brand, logo or image of the real persons or legal entities can be used in program sponsorship; however medical products or medical treatments subject to prescription that real persons and legal entities produce or sell may not be used.

(4) Program sponsorship is not allowed in news bulletins and religious ceremony broadcasts.

(5) Program-sponsorship shall not be allowed to affect the media service provider's editorial independence and liability. When indicating at the start of the program that the program is being sponsored, upon entry to and exit from advertising breaks within the program, and at the end of the program, leasing or buying the program sponsor's products or services may not be directly encouraged, and the products or services may not be overemphasized.

## **Product Placement**

**ARTICLE 13** – (1) Except for films, series, sports and general entertainment programs made for cinema and television, product placement in broadcasts is not allowed. Product placement practices are subject to the regulations pertaining to commercial communication.

(2) Under conditions to be specified by the Supreme Council, in events where specific goods and services are included in the program free of charge, product placement is allowed.

(3) Product placement shall not be allowed to affect the media service provider's editorial independence and liability. Leasing or buying the product or service may not be directly encouraged and the product may not be overemphasized via product placement. Viewers shall be clearly informed about the existence of product placement at the beginning and end of the program, and when the program returns after an advertising break.

(4) In news bulletins, children's programs and religious programs, product placement is not allowed.

(5) Products whose commercial communication is banned shall not be allowed to be used in product placement.

## **SECTION FIVE**

### **Media Service Content**

#### **General and Thematic Broadcast**

**ARTICLE 14** – (1) In media services, broadcasts with general or thematic contents may be conducted. During their application for a broadcasting license, media service providers shall inform the Supreme Council of their broadcast type(s) in writing. The broadcast type(s) shall be clearly stated in the license to be granted to these providers by the Supreme Council.

(2) The broadcast services shall be conducted in the type(s) and in the selected language confirmed with the Supreme Council. The broadcast type(s) can be changed with the permission of the Supreme Council upon request. The requirements of changing the broadcast type(s) will be established by the Supreme Council. An enterprise whose broadcasts do not comply with the type(s) specified in their license shall be considered in violation of the terms of the broadcast license.

(3) If television enterprises that produce general and thematic broadcasts include children's cartoons in their broadcasts, at least twenty percent of the cartoons and at least forty percent of other children's programs shall be productions made in the Turkish language and reflecting the Turkish culture. Statistical data related to the broadcast times and lengths of children's broadcasts, and details of the place of production shall be reported to the Supreme Council in monthly lists.

(4) Radio and television enterprises must have Turkish folk and Turkish classical music programs in their broadcasts at a certain percentage and at certain times. The rules of the percentages and broadcasting times of such programs will be determined by the Supreme Council.

#### **European Works**

**ARTICLE 15** – (1) Television broadcasters that hold national terrestrial broadcasting license shall:

a) Allocate at least fifty percent of their broadcast time (excluding the time allocated to news, sporting events, contests, advertisements, tele-shopping and related data broadcasts) to European works.

b) Allocate ten percent of their broadcast time or program budget (excluding the time allocated to news, sporting events, contests, advertisements, tele-shopping and related data broadcasts) to European works of independent producers.

2) The procedures and rules encouraging on-demand media service providers to sponsor the production of and access to European works will be determined by the Supreme Council.

#### **Right of Rectification and Reply**

**ARTICLE 18** – (1) If a broadcast about real persons or legal entities is conducted that might violate their honor and dignity, or runs contrary to the facts, on condition of not being contrary to the interests of third parties protected by law and not including a criminal element, such persons and entities shall send a rectification and reply letter to the relevant media service provider within sixty days of the broadcast date. Media service providers shall broadcast the letter, without any amendment or insertion, at the time and in the program subject to rectification and reply, within a maximum of seven days after they receive the letter and in such a manner that is clearly understandable and which viewers can easily follow. In the event that the program subject to the rectification and reply letter has been removed or suspended, the right to rectify and reply shall be exercised within a seven-day period of the broadcast time of the said program. In the rectification and reply, the broadcast that has caused its issuance shall be specified.

(2) If the rectification and reply is not broadcast within the period stated under paragraph one from the end of such period; or if it is broadcast in violation of the provisions of paragraph one, within ten days

from the broadcast of the rectification and reply the person involved may ask the court to decide that the rectification and reply be broadcast in accordance with the provisions of paragraph one. The competent court is the court of minor criminal claims in the location where the applicant resides. In the event that the applicant resides abroad, the competent court is the Ankara Court of Minor Criminal Claims in Ankara.

(3) The judge of the court of minor criminal claims shall conclude the case in three days without a hearing. Within seven days from the notification, the decision may be appealed before the competent criminal court of first instance. The criminal court of first instance decides within three working days after examining the objection, and renders its final decision.

(4) In the event that the judge decides the rectification and reply should be broadcast, the seven-day period in paragraph one will start from the date the decision becomes definite, if any objection has not been made against the decision of the judge of court of minor criminal claims; and from the date of notification of the decision of the criminal court of first instance if any objection has been raised.

(5) If the person who has the right of rectification and reply dies without exercising such right, this right can be used by one of his/her inheritors. In this situation, thirty days are added to the remaining rectification and reply period, provided that the demise has occurred within the sixty-day period for the right of rectification and reply.

(6) Due to financial and moral damages arising from broadcasts that abuse the personal rights of real persons and legal entities, the broadcast's producer is jointly liable with the media service provider.

(7) The person involved may directly request the right of rectification and reply specified under paragraph one from the court of minor criminal claims within the same periods.

### **Viewer Representation**

**ARTICLE 22 –** (1) Media service providers must appoint a Viewer Representative with at least 10 years of professional experience for the purpose of forming the co-regulation and self-regulation mechanisms, evaluating complaints from viewers and listeners, presenting said complaints to the broadcasting board of the enterprise and following up on the results. The selected Viewer Representative shall be announced by appropriate means to the public and confirmed with the Supreme Council.

### **Protective Symbol System**

**ARTICLE 24 –** (1) Media service providers inform viewers vocally or in writing about the contents of program services by using a protective symbol system.

(2) The procedures and principles of the protective symbol system are established by the Supreme Council.

(3) This article shall also be applied to the Turkish Radio-Television Corporation.

## **SECTION NINE**

### **Election Periods**

#### **Broadcast During Election Periods**

**ARTICLE 30-(1)** The procedures and principles related to election broadcasts aired during election periods shall be regulated by the High Election Board.

(2) The Supreme Council monitors, controls and evaluates broadcasts of media service providers during election periods in line with the resolutions of the High Election Board.

(3) The provisions under Article 149/A of the Law on the Main Provisions of Elections and Voter Registers No. 298 of 26/4/1961 shall be enforced following resolutions of the High Election Board.

### **Political Advertisement**

**ARTICLE 31** – (1) Media service providers can broadcast the advertisements of political parties and candidates during an election period announced by the High Election Board until the time the broadcast prohibitions start.

(2) Political advertisements shall comply with the provisions of the Law and the principles and procedures established by the High Election Board.

## REGULATIONS ON THE PROCEDURES AND PRINCIPLES OF MEDIA SERVICES

November 2, 2011 WEDNESDAY

Official Gazette No.: 28103

### Principles for Media Services

ARTICLE 8 – (1) Media service providers shall provide their media services in accordance with the principles for media services, with an understanding of the responsibility to the public. Media services:

- a) Shall not act contrary to the existence and independence of the State of the Republic of Turkey, the indivisible integrity of the State with its territory and nation, or the reforms and principles of Atatürk.
- b) Shall not incite society to hatred and hostility by discriminating on the grounds of race, language, religion, sex, class, region or sect and shall not constitute any feelings of hatred in society.
- c) Shall not act contrary to the rule of law and the principle of justice and impartiality.
- d) Shall not act contrary to human dignity and the principle of personal privacy, and shall not include disgraceful, degrading or defamatory expressions against persons or organizations beyond the limits of fair criticism. Scenes of individuals suffering, dying, being wounded or similar situations shall not be displayed in a way that leads to emotional exploitation. Information, documents and records related to one's private life shall not be broadcast without the permission of the individual(s), and inviolability of residence shall not be infringed. The records of security cameras or similar instruments shall only be broadcast with the permission of the related individual(s) unless they contain an offense to human dignity and personal rights. News related to bribery, sexual harassment or similar criminal acts shall not be reported with the use of interpretative editing.
- e) Shall not glorify and encourage terror; shall not display terrorist organizations as powerful or justified, and shall not portray terrifying or deterrent features of terrorist organizations. They shall not present the act, the perpetrators or the victims of terror in a way that serves the interests of terrorism. Broadcasts which may negatively affect the personal rights of terror victims and their relatives shall not be allowed.
- f) Shall not include or promote broadcasts which discriminate on the basis of race, color, language, religion, nationality, sex, disablement, political and philosophical opinion, sect or any such considerations, or degrade individuals.
- g) Shall not run contrary to the national and moral values of society, general morality and the principle of protection of the family.
- h) Shall not glorify committing a crime, criminals or criminal organizations, and shall not be instructive on criminal techniques.
- i) Shall not promote the abuse of children or the weak and disabled, or encourage violence against them. Any kind of discrimination or violence against them, be it physical, emotional, verbal or sexual, shall not be encouraged.
- j) Shall not encourage the use of addictive substances/actions such as alcohol, tobacco, narcotics or gambling.
- k) News bulletins and news programs shall be predicated on the principles of impartiality, truthfulness and accuracy, and shall not impede the free formation of opinions within society. News that can be investigated within the framework of the journalistic code of ethics shall not be broadcast without having first been investigated and assured of its accuracy. In news reporting, exaggerated audio and images and any effects/music other than natural sounds shall be avoided. The status of images as an archive, re-enactment or as a source of news obtained from other news agencies or media sources shall be specified. In live programs, the word "live" shall be explicitly displayed throughout the program; likewise, the word "repeat" shall be explicitly displayed when a program is repeated.
- l) Shall not declare or present anyone as guilty unless conclusively proven by a judicial decision, and shall not in any way affect the trial process and its impartiality beyond its newsworthiness during the judgment process in cases that have been passed to the judiciary.
- m) Shall not contain any elements that serve unfair interests and lead to unfair competition.

n) Shall not be biased towards or in favor of political parties and democratic groups. Speakers must be impartial during programs.

o) Shall not encourage any acts which might jeopardize the general health and protection of the environment and animals.

p) Shall ensure that the Turkish language is used in a proper, favorable and intelligible way without undermining its characteristics and rules, and shall not display coarse, slang or poor quality use of the Turkish language.

r) Shall not be obscene and shall not act in a way that is oriented to exploiting sexual emotions, demonstrating individuals as sexual commodities, degrading the human body as an element of sexual incitement, utilizing obscene words and behaviors which cannot be exhibited in public areas, demeaning/shaming an individual's honor, or inciting and exploiting their sexual desires.

s) Shall respect the right of rectification and reply of individuals and institutions. The statements decided on by the courts on the right of rectification and reply shall be broadcast audio-visually for television viewers or audibly for radio listeners so that they can easily follow.

t) Shall not promote any competition or lottery, nor award any prizes to listeners or viewers or act as an intermediary for awarding of prizes.

u) Surveys and public opinion polls which are conducted or commissioned by the media service provider shall be exercised in the presence of the notary from their preparatory stage until the announcement of the results. This procedure shall be announced to the public and any relevant documents will be submitted to the Supreme Council, if demanded.

v) Shall not exploit viewers/listeners by way of fortune-telling or superstitions. .

y) Shall not contain any content that runs contrary to gender equality, or encourages or normalizes oppression of or exploitation of women. Media services shall not provoke traditional practices to be exerted as a tool to suppress women in society.

z) Shall not encourage or inure violence. Media services shall not cause the acquisition of aggressive behaviors or attitudes, nor the desensitization against or the normalization of violence. Sounds and scenes containing elements of violence shall not be broadcast in news bulletins or news programs beyond their newsworthiness by extending their duration superfluously, presenting them tautologically, or spoiling their originality and quality. Likewise, comments and expressions which justify violence shall not be broadcast.

(2) In radio and television broadcast services, any programs which could impair the physical, mental or moral development of children and young people shall not be broadcast during the watershed hours, even though smart signs are used. Likewise, elements of violence, sexuality etc. which might harm the physical, mental or moral development of children and young people shall not be broadcast in program promotions during watershed hours.

(3) On-demand media service providers shall ensure that media programs which could adversely impact the physical, mental or moral development of young people and children are provided in such a way that, under normal circumstances, they will not hear and see such programs. Such programs shall not be broadcast without encryption or any other similar protection system, or without precautions taken to ensure that the subscriber is an adult, and is in no way a child or young person.

### **Viewer Representatives and Their Duties**

ARTICLE 22- (1) Media service providers shall employ a Viewer Representative. Viewer Representatives must have at least 10 years of professional experience in the broadcasting field, and possess credibility with viewers. Media service providers shall announce to the public the Viewer Representative's identity and provide contact information regarding where and how to appropriately complain/comment about a program at the end of the program.

(2) Viewer Representatives:

a) Shall ensure the establishment of the necessary infrastructure to receive viewer feedback.

b) Shall have a link on the media service provider's official website through which they shall showcase viewer feedback received, and their evaluations.

c) Shall separately evaluate feedback collected from viewers, and feedback sent by the Supreme Council. The Viewer Representative shall respond to feedback on the principles of media service and commercial communications in media services.

ç) Shall report their studies on viewer feedback to the executive board of the media service provider at the end of each month, and shall announce their studies on their official, public website if the broadcasting schedule allows.

d) Shall primarily evaluate and act upon the complaints and opinions submitted by the Supreme Council in the framework of self-regulation.

### **Protective Symbol System**

ARTICLE 23 - (1) Media service providers shall inform viewers about the content of program services through audio or written announcements by using the protective symbol system.

(2) The protective symbols shall be classified according to the categories of age and content. The process of classification shall be conducted according to the procedures and principles in the Coders' Application Guide and updated as required by the Supreme Council. The Coders' Application Guide shall be published on the Supreme Council's website.

(3) Protective symbols indicate whether or not a program includes potentially harmful content and/or what age category it is intended for.

(4) If a program's content includes violence, fear, sexuality or attitudes which may constitute negative impressions such as discrimination, excessive use of alcohol/tobacco and /illegal substances, illegal behavior or bad language, then the symbols of "Violence/Fear", "Sexuality" and/or "Bad Behavior" attached in Annex 1 shall be inserted in order to identify that the program may likely include harmful content.

(5) Convenience of the program content in terms of age groups shall be defined with the symbols of "General Viewer", "7+", "13+" and "18+" as attached in Annex 1, which has been established by taking into consideration the vulnerability levels of various age groups. The symbols "13+" and "18+" shall be displayed continuously during the program in one corner of the screen. The symbol "7+" means a program can be broadcast all hours of the day; the symbol "13+" means a program can be broadcast after 21:30; and the symbol "18+" means the program cannot be broadcast outside the time interval between 24:00-05:00 hours.

(6) Whether a program includes harmful content and which age group it is convenient for shall be determined automatically by the system itself, as a result of the responses supplied by the certified coders designated by media service providers and trained in advance on the system by the Supreme Council by means of filling out the Sample Coding Form on the Supreme Council's official website.

(7) This article shall also be valid for the Turkish Radio-Television Organization.