



DOĞAN GROUP

SOCIAL RESPONSIBILITY POLICY



1. OBJECTIVE

The objective of this policy is to disclose our social responsibility principles as the Doğan Group and to emphasise the significance of practices within the scope of social responsibility for our Group.

2. SCOPE

According to Doğan Group, social responsibility is related to companies managing their work processes in such a way as to leave a positive impact on the society. Doğan Group, which manages its work processes around the four basic principles of corporate governance, namely transparency, fairness, accountability and responsibility, adopts a consumer-oriented work approach with full regard for public welfare. The most essential is creating sustainable economic value for all social stakeholders under fair conditions. Therefore, our social responsibility policy is based upon the principle of supporting all efforts contributing to the social and economic prosperity in all our business processes and being responsive to all issues concerning our society and the sustainable development of the human capital. This policy covers our basic principles regarding our approach to social responsibility.

Our Social Responsibility 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,

This policy is an inseparable part of the Code of Ethics which has been publicly disclosed and approved by the Executive Committee, guides us in shaping our work style.

3. TARGET

The basic objective of this policy is to create positive and sustainable economic and social impacts respectful to the universal values and take our society forward.

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.
- 4.6. Employee** refers to Doğan Group personnel.
- 4.7. 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 Doğan Group, especially the Honorary Chairman Aydın Doğan and the Doğan family, play a leading role in the implementation of the Social Responsibility Policy.

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

Social Responsibility 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.

5.3. Vice Presidency of Corporate Communication

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

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

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

5.4. Doğan Group Employees

All Doğan Group employees are responsible for

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- a. complying the Doğan Group policies,
- b. working in compliance with the internal and external laws, standards and regulations,
- c. reporting any conduct, activity or practice contrary to the policy to the Internal Audit Department.

5.5. Directorate of Information Systems

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

5.6. 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

Our Group believes that a strong and contemporary society would come into existence through raising modern generations that would respect universal values and contribute to the solution of social and economic problems and in this sense places importance on being involved in social responsibility activities in order to raise awareness and to create positive impacts on the society. As the Doğan Group, we make an effort for the sustainable development of our society by trying to fulfill our social and environmental responsibilities. The principles we take as basis in our social responsibility works are as follows:

- a. Finding the development areas that would minimize the environmental impacts, which might arise from our activities, and applying environmental solutions,
 - b. Generating, developing, or supporting projects that would take our society further in economic and social sense,
 - c. Contributing to raising of modern generations by performing works in the field of education,
 - d. Raising high quality human resources by providing the necessary work environment for the individual developments of our employees,
 - e. Contributing to raising awareness in individuals for the solution of social problems through the activities of our media companies and/or the supports we provide to valuable projects carried out by other organizations,
- Assisting in raising awareness in the society about domestic violence, women’s rights, and education of girls through effective social responsibility projects we carry out in these fields,



- Emphasizing human rights and equality; trying to instill the consciousness in the society that people should not be discriminated based on language, race, color, gender, political opinion, faith, religion, sect, age, physical disability, and similar reasons,

f. Taking care to ensure that all our social responsibility works create measurable and sustainable impacts.

We actively use the media and the Aydın Doğan Foundation within the scope of our Social Responsibility projects. We adopt it as a principle to increase social consciousness and to create awareness in the society through the use of these instruments.

Aydın Doğan, the founder of the Doğan Group, who believed that the value of an organization was measured with what it returned to the society from the earnings it gained from the society, founded the Aydın Doğan Foundation in 1996 in line with this belief.

The Foundation gets education and sports institutions constructed, supports these institutions for the provision of high quality education, and promotes education, culture, various branches of art, and artists by organizing national and international contests and granting awards.

In addition to the social responsibility projects, in which our Group is involved, we also aim to support projects that are valuable for and that would add value to our society.

We prioritize benefit of society in all our activities and take care to encourage our employees to undertake voluntary works in social responsibility areas.