



# DOĞAN GROUP

## SUPPLY CHAIN MANAGEMENT POLICY



## 1. OBJECTIVE

The objective of this policy is to explain the standards and basic principles upheld by the Doğan Group in its relations with its suppliers. The aim of the Doğan Group through this policy implemented for its relations with its suppliers is to ensure that relations are formed and developed with responsible suppliers who act in compliance with the quality and the objectives of its business conduct.

## 2. SCOPE

As Doğan Group, we expect all companies to adhere to our Supply Chain Management Policy. This policy covers our basic principles governing supply chain management.

Our Supply Chain Management policy covers:

- Doğan Group employees,
- our external service providers, other persons and institutions (business partners) undertaking work on behalf of the Doğan Group companies including consultants, lawyers and external auditors.

This policy is an inseparable part of the Code of Ethics, Occupational Health and Safety Policy, and Anti-Bribery and Anti-Corruption Policy, which have been approved by the Executive Committee, and made public.

Accordingly, it is essential that our suppliers comply with the legal regulations in effect, as well these basic policies and rules, in addition to the requirements set forth in all other work ethics related documents.

## 3. DEFINITIONS AND ABBREVIATIONS

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

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

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

**3.3 Senior Management** refers to the Doğan Holding Executive Board and Chief Executive Officer

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



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

**3.6 Employee** refers to Doğan Group personnel.

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

## **4. ROLES AND RESPONSIBILITIES**

### **4.1. Senior Management**

Senior Management is responsible for the implementation of the Supply Chain Management Policy. Senior management is in charge of preparing, implementing and, where necessary, updating this policy.

The Executive Committee is responsible for:

- a. taking the necessary measures to ensure the compliance of the employees and external service providers with the policy,
- b. reviewing issues and reporting them to the Vice Presidency of Internal Audit for the review of matters contrary to the policy.

### **4.2. Vice Presidency of Financial and Administrative Affairs**

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

Vice Presidency of Financial and Administrative Affairs is responsible for executing this policy and working to develop it, where necessary.

### **4.3. General Counsel**

General Counsel is responsible for making sure that provisions, which render the contracts signed with our suppliers agreeable with this policy, are included in the contracts.

The Counsel includes the principle of confidentiality in the contracts made with our suppliers in line with our Information Security and Information Technologies Policy.



#### **4.4. External Service Providers**

Doğan Group aims to work with approved suppliers chosen according to criteria such as financial performance, experience, technical competence etc.

External Service Providers and business partners must comply with the principles of the policy and other relevant regulations. All relations are terminated with non-compliant persons and institutions. External service providers are expected to inform their employees about this policy via their supply chain.

#### **4.5. Directorate of Information Systems**

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

#### **4.6. Vice Presidency of Corporate Communication**

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

#### **4.7. Directorate of Investor Relations**

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

### **5. PRINCIPLES OF IMPLEMENTATION**

#### **5.1. General Practice**

Doğan Group's principle is to conduct its activities in a responsible and ethical manner. We are committed to adhere to transparency, fairness, accountability, and responsibility in supply chain management, within the scope of our Corporate Social Responsibility Approach.

We respect and support international human rights principles which target advocating and protecting human rights, including the Universal Declaration of Human Rights of the United Nations, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Our adoption of the abovementioned universal principles demonstrates our commitment to developing the work place, protecting the environment, respecting human rights, and improving the society we live in.



Within this scope:

- Our suppliers must fulfil legal requirements, and must adhere to these policies and rules, in addition to the requirements set forth in all other work ethics related documents.
- When choosing suppliers, criteria such as financial performance, experience, technical proficiency, etc. are taken into account in addition to a positive history, and assessments on previous years.
- With regards to supplier selection and management, the executives of the related department are in charge of preparing approved supplier lists, and creating management and monitoring systems.
- When we choose the suppliers with whom we decide to work, we assess them based on objective criterias. As the Doğan Group, our objective is to create mutual value in our business relations with our suppliers.
- As the Doğan Group, we place importance in obeying the laws of the countries in which we operate, in the course of our supply chain management processes.
- Our objective is to ensure that the Doğan Group suppliers obey the laws, rules, and regulations. We expect the suppliers, as well as the suppliers and the subcontractors that our suppliers work with to be knowledgeable about business related practices. Doğan Group reserves the right to terminate its relations with the suppliers who fail to obey these rules.
- It is highly important that the compliance of the goods and services provided by our suppliers with the Quality Management System is objectively audited by persons who are specialised in their relevant fields.
- The supplier audits to be conducted based on the standards, policies, and procedures of our Group will ensure that we see the current status of our suppliers, and enhance our capability to intervene with the possible problems and discrepancies in advance.
- We target organizing various training courses for our suppliers within the scope of this policy, and other related documents.

The outline of the principles adhered to by the Doğan Group in its relations with its suppliers is as follows:

#### **5.1.1. Legislation and Regulations**

Doğan Group suppliers as well as the persons we do business with, or purchase goods or services from are expected to comply with all the relevant laws and regulations in all countries they conduct business,

Document Name:	Page :	5/7
Document Reference No:		



including laws on commercial conduct, product quality, environmental standards, occupational health and safety, and work and employment.

#### **5.1.2. Environment**

We expect the Doğan Group suppliers to comply with all local and national laws governing environment, and the relevant legislation. Suppliers are expected to carry out their activities in such a way as to minimize the adverse effects thereof on natural resources, and in a manner to protect the environment, as well as their customers and employees.

#### **5.1.3. Respect for Human Rights**

As the Doğan Group, our objective is to work with suppliers who respect human rights, who do not discriminate in any manner whatsoever, and who offer equal opportunities for their employees.

Our suppliers must adhere to the valid legislation, and above all, with the working hours, and overtime rules.

We expect our suppliers not to discriminate on grounds of race, gender, nationality, age, physical disability, association memberships, pregnancy, or marital status.

#### **5.1.4. Child Labour**

As the Doğan Group, we are extremely sensitive about not employing child workers, and we expect the same sensitivity from all suppliers. Our suppliers must not employ workers below the age limit defined in the legislation.

#### **5.1.5. Forced or Mandatory Employment**

As the Doğan Group, we expect that manners of employment such as forced or mandatory employment, employment under slavery, employment during military service, and employment in prison should not be resorted to, and we expect all our suppliers to be sensitive in this matter.

#### **5.1.6. Fighting With Bribery and Corruption**

We expect the suppliers not to tolerate bribery and corruption in any manner whatsoever, and to act sensitively in this matter.



### **5.1.7. Workers' Health and Work Safety**

As the Doğan Group, we expect our suppliers to offer a healthy and reliable working atmosphere for its employees. The suppliers must comply with all health and safety related legislation in effect.

### **5.1.8. Intellectual Property and Confidential Information**

The suppliers must respect the intellectual property rights of the Doğan Group, and must inform us when they learn about any dangers related with and/or violations of such rights. Accordingly, they must act in cooperation with the Doğan Group to prevent and/or terminate a possible violation.

Suppliers must use appropriate security measures, and thus protect all Doğan Group information they have but not limited to this, including all financial tables, reports, financial and legal information, brand, corporate information, inventions, business, methods, advances and patents, copyrights, brands, commercial-financial-technical secrets or any and all other information subject or not subject to legal protection, all written and/or verbal commercial, financial, technical information and documents they will learn during the course of such relationship. It is possible by giving the confidential information to its workers, employees, and consultants on a need to know basis, but to warn its workers, employees, and consultants about the confidentiality of such information, and to ensure that these persons comply with the requirements of confidentiality.