



**DOĐAN ŐİRKETLER GRUBU
HOLDİNG A.Ő.**

SUSTAINABILITY POLICY

November 2022



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Doğan Şirketler Grubu Holding A.Ş. Sustainability Policy

1. OBJECTIVE

Doğan Holding A.Ş. (“Holding”) Sustainability Policy (“Policy”) is the overarching policy that lays out the sustainability approach of Doğan Holding and Group Companies. Where necessary, this policy may be supported by additional topic-specific policies, procedures and guidelines to ensure effective implementation at the Holding and Group companies.

2. SCOPE

This Policy applies to the Holding and Group companies. The CEOs and the Boards of Directors of respective Group companies are responsible for the implementation of this Policy in their organizations.

3. DEFINITIONS and ABBREVIATIONS

CDP (formerly Carbon Disclosure Project): CDP is an international not-for-profit organization, headquartered in London, UK, that runs a global disclosure system and facilitates reporting by public companies regarding how they utilize natural resources and natural capital, how they impact regeneration of limited resources through their activities, and how they manage their environmental risks.

Doğan Holding: Refers to Doğan Şirketler Grubu Holding A.Ş.

Doğan Group: Refers to Doğan Şirketler Grubu Holding A.Ş., its subsidiaries, affiliates, and business ventures.

Executive Management: Refers to Doğan Holding Executive Committee, Chief Executive Officer, and C-Suite Executives (if a subsidiary or affiliate does not have such, CEOs of relevant organization).



4. ROLES and RESPONSIBILITIES

4.1. Board of Directors: Board of Directors is responsible for allocating, monitoring and guiding the resources needed to ensure that the Holding and Group companies comply with the sustainability strategy and goals. Sustainability Committee regularly (and at least annually) provides the Board of Directors with information on all sustainability activities and performance .

4.2. Doğan Holding Sustainability Committee: The Committee, on behalf of the Board of Directors, is responsible for determining the Holding’s Sustainability Policy, strategy and objectives regarding the environmental, social and corporate governance aspects, and ensuring coordination between the Group companies. In broad terms, Sustainability Committee’s responsibilities include the following:

- Drafting Doğan Holding's sustainability strategy and submitting it to the Board of Directors,
- Monitoring the implementation of the strategy at Doğan Holding and Group companies and submitting the strategy roadmap to the Board of Directors for information purposes and approval,
- To ensure that the activities at Doğan Holding and Group companies are carried out in line with the sustainability goals and targets, action plans and relevant performance criteria,
- Reviewing sustainability-related policies, management systems, operating principles, related practices, targets, and performance delivery regularly (an at least once a year) and submitting recommendations to the Board of Directors, if revisions are needed.

When needed, Doğan Holding Sustainability Committee may establish working groups consisting of relevant Committee members or external experts. Working groups support Doğan Holding Sustainability Committee on the sustainability topics within their purview and build an environment for learning, exchanging experiences, and developing inter-company projects on shared topics.

Sustainability Committee, as the owner of this Policy and on behalf of the Board of Directors, is also responsible for ensuring effective implementation of the Policy and the commitments therein.



4.3. Corporate Communications and Sustainability Department: In addition to coordinating the sustainability-related activities at Holding and Group companies, Corporate Communications and Sustainability Department also serves as the Secretariat of the Sustainability Committee.

5. IMPLEMENTATION

5.1. Sustainability Approach

Doğan Holding strives to minimize environmental risks for the future of humankind and life on Earth and transform opportunities into achievements that create added value, and develops in-depth solutions to global and local issues, recognizing that sustainability is the most important concept that should be embraced today and tomorrow.

Doğan Holding believes that sustainability should be ensured in production and business processes and aims to create positive impact beyond reducing its environmental effects. Accordingly, Doğan Holding adopts an equitable and inclusive business model that covers all stakeholders, from employees and business partners to the supply chain and customers.

Doğan Holding integrates sustainability as an essential part of its business strategy to gather and manage all sustainability-related efforts systematically under one umbrella. ‘**Doğan Impact Plan,**’ designed with the approach of “investing in the planet, an inclusive society and the future” to contribute to the solution of the current ecological, social and financial problems, guides the sustainability strategies of the Holding and Group companies.

Doğan Holding works to add value to **Planet** by taking firm steps against climate change, to **Society** by promoting equality and local production, and to the **Future** in constant pursuit of innovation. Accordingly, Doğan Holding:

- Accepts it as a key responsibility to protect the environment for a better future,
- Develops products and services that respect the environment,
- Measures the environmental impact of its operations and takes actions to improve its environmental footprint,
- Adopts an egalitarian and inclusive business model that covers all stakeholders, from the employees and business partners to the supply chain and customers; and stands against all forms of discrimination,



- Builds its operations on the pillars of human rights, equal opportunity, and code of ethics,
- Works to communicate its sustainability approach to all stakeholders,
- Establishes relationships based on trust in all local and international partnerships,
- Fosters its entrepreneurship vision with open innovation, cross-industry collaborations, and partnerships,
- Implements sustainable-development-focused business models in new investments and transforms existing business models as part of its responsible investment approach,
- Considers innovation, social benefit, and environmental protection in its investments.

Doğan Holding shapes all stages of its operations according to the “**United Nations 2030 Sustainable Development Goals**” and guides the sustainability efforts of the Holding and Group companies through internationally recognized sustainability initiatives such as UN Global Compact, UN Women's Empowerment Principles, and World Economic Forum Stakeholder Capitalism Metrics Initiative as a signatory.

5.2. Sustainability Principles

Doğan Holding:

- Aims to create long-term economic value in all the industries in which it operates, continuously improves its economic performance and profitability, and contributes to create employment.
- Supports its stakeholders to mitigate their environmental impact and provide social benefits by diversifying its responsible investment tools.
- Recognizes that technology and digitalization are major global trends with different risk and opportunity aspects for its operations and focuses on technology investments to align with this trend to ensure the sustainability of its business models.
- Builds relationships based on fairness, transparency, responsibility and accountability principles with all its stakeholders.
- Aims to attract and retain the best talent to Doğan Group as part of talent management, build on their current potential, and create value by



- implementing the most effective digital and employee-centric HR policies, systems and processes.
- Provides equal opportunity to all the employees in Group companies, starting from the recruitment process, and actively leverages the potential power of diversity and differences.
- Operates with the goal of zero workplace accidents and occupational diseases by placing the health and safety of all its employees at the core and focuses on effectively managing occupational health and safety risks.
- Encourages the active participation of individuals in cultural life to enable sustainable development and supports the development of individual and social cultural liberties in society by preserving cultural heritage.
- Provides quality education to prepare next generations for the future and close the talent gap in the rapidly evolving world and contributes to social development with activities in the fields of education, social change, culture and arts while creating value for society through its investments.
- Espouses investing in business models that promote a responsible resource utilization approach through energy and emission management, and that maximize the use of alternative fuels, decrease energy consumption, improve energy efficiency and subsequently reduce carbon emissions.
- Accepts it as a material environmental issue to use water more efficiently in all its operations, to recycle and reuse water to the extent possible, and dispose of wastewater without harming the environment.
- Strives to reduce waste generation, dispose of waste at the source, and prevent environmental pollution in all operational processes, from the design of products and services to production, packaging, logistics, and delivery to customers.
- Monitors the impact of the industries in which it operates, starting with the energy sector, on biodiversity and focuses on reducing these impacts and preserving biodiversity by identifying the impact areas of the relevant industries.



5.3. Material Topics

Doğan Holding's material topics refer to the areas where sustainability efforts will be focused and performance will be disclosed transparently to the stakeholders.

Material topics are identified by considering several factors such as sustainability aspects, risks and opportunities, the rising trends and developments on the global agenda, and the internal and external stakeholder expectations in all the relevant industries. These material topics are reviewed every reporting period.

Based on the assessments, the material issues are categorized as **very high priority**, **high priority**, and **priority**. They are then classified and defined under three main topics: **economic value**, **social value**, and **environmental impact**. Each material issue is also associated with the relevant UN Sustainable Development Goals.

The development of performance and the details of the actions related to the material issues under each category are disclosed to the stakeholders through sustainability reports.

5.4. Doğan Impact Plan

Doğan Impact Plan is a strategy that facilitates the assessment of sustainability transformation and sustainability performance in both Holding and Group companies.

The sustainability targets of the Holding and Group Companies are monitored under the three main topics: “value for the future,” “value for society,” and “value for the planet” as defined in the **Doğan Impact Plan**. These three topics are identified to contribute to solving the ecological, social, and financial problems.

Sustainability Committee submits reports to the Board of Directors regarding all the activities and target realizations in line with **Doğan Impact Plan**. The Corporate Governance Committee is also provided with information on these topics regularly.

Detailed information regarding the targets specified in the **Doğan Impact Plan** is communicated to the stakeholders through sustainability reports and annual reports.



5.5. Reporting and Disclosures

Sustainability reports are prepared and published at regular intervals to accurately and transparently disclose the sustainability performance of the Holding and the value created in this area, and made publicly available for all stakeholders through various communication channels (Public Disclosure Platform, corporate website, press releases, etc.).

Furthermore, Holding submits climate reports to platforms like CDP and is included in sustainability indices such as BIST Sustainability Index, and strives to obtain high scores.

All disclosures required by applicable laws and regulations are published within deadlines in coordination with the Investor Relations Department by following the formats specified in legislation.

In addition, Holding establishes necessary communication channels to enable internal and external stakeholders to submit their sustainability-related opinions and suggestions.

5.6. Stakeholder Engagement

Doğan Holding adopts the broadest definition of the stakeholder concept in line with the United Nations Sustainable Development Goals and stakeholder capitalism principles.

Doğan Holding carries out its sustainability-related activities by considering all stakeholder needs and priorities. Accordingly, Holding strives to maintain continuous and transparent communication with the stakeholders and reaches decisions based on the type of communication tools and frequency as well as the attributes of the stakeholder groups to ensure that their needs and expectations are met accurately.

5.7. Training Activities

Face-to-face and/or online training programs are organized to raise awareness and/or build on the skills of the employees and senior management regarding sustainability. These activities can be in the form of specialty training on specific topics or workshops and interactive meetings to enhance the synergy between the Holding and the Group companies.



6. ENFORCEMENT

This Policy comes into effect with the approval of the Executive Committee. All amendments to the Policy are subject to the approval of the Executive Committee.

7. RELATED DOCUMENTS

APPENDIX-1: Sustainability Committee Terms of Reference



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Sustainability Committee Terms of Reference

Purpose

Doğan Holding Sustainability Committee (Committee) is established to determine the sustainability strategy of Doğan Holding (Holding) and Group Companies, to carry out the necessary practices to achieve the sustainability goals and objectives within the framework of this strategy and to provide support and advice to the Board of Directors on all issues related to sustainability.

Committee Organization

- Doğan Holding Sustainability Committee reports to the Board of Directors.
- The Committee has the authority to decide on all issues related to sustainability. However, in accordance with corporate governance practices and principles, the Board of Directors has the ultimate authority to take decisions on matters falling within the sphere of its responsibility.
- The Committee is governed by the principle of Co-Chairship. One of the Co-chairs is the CEO, and other Co-Chair is one of the Independent Board Members of Doğan Holding.
- Members of the Committee are selected among the senior executives of the Holding and Group Companies who have the signing authority, in order to provide administrative convenience. As the coordinator of the Committee, the Vice President, Corporate Communications and Sustainability, supports the Committee co-chairs in the member selection processes.



- The Corporate Communications and Sustainability Department carry out committee secretariat.

Principles and Meetings

- The committee meets with absolute majority, at least three times a year. When deemed necessary, the number of meetings may be increased or decreased.
- The meeting agenda is determined by the Committee Secretariat in consultation with the Committee Co-Chairs and is shared with the Committee members prior to the meeting. Other members may also add items to the agenda by informing the Secretariat before the meeting.
- The Committee may invite executives or independent experts to the meetings to receive their suggestions.
- Committee decisions are taken by simple majority. In case the decisions are not taken during the meeting, the Committee secretariat can receive opinion/approval from the Committee members via e-mail.
- The relevant Company General Managers and Group Presidents are responsible for the implementation of the decisions taken by the Committee in the Group Companies.
- When deemed necessary, the Committee may establish sub-working groups to work on the specific subjects.



Duties and Responsibilities

The main duties and responsibilities of the Committee are summarized below:

- To determine the sustainability policy, strategy and roadmap of the Holding,
- To carry out the necessary practices to ensure that the activities of the Holding and Group Companies are performed in accordance with the sustainability policy, strategy and roadmap, sustainability targets, action plans and related performance indicators,
- To review the policies, procedures, practices, targets and performance realizations related to sustainability, at least twice a year, and to submit amendment proposals for the approval of the Board of Directors, when necessary,
- To establish sustainability working groups and monitor their activities, if need be.
- To follow the national and international developments related to sustainability, to identify the issues affecting the Holding and Group companies and to ensure that these are integrated into the sustainability strategy,
- To approve the Holding Sustainability report,
- To evaluate the Sustainability Policy and sustainability-related policies for the approval of the Board of Directors and to provide opinion.

Reporting

- The committee decisions are recorded by the Secretariat and shared with the members after each meeting, and the minutes are archived.
- The Committee informs the Corporate Governance Committee and the Board of Directors about its activities at least once a year



Enforcement

- This document comes into force after being approved by the Sustainability Committee. Changes are also subject to the approval of the Sustainability Committee.