



DOĞAN GRUBU

SOCIAL MEDIA USE POLICY



1. OBJECTIVE

The objective of the Social Media Use Policy (“Policy”) is to lay out the guidelines and principles for the use of social media in compliance with applicable laws, regulations and corporate policies both as a company and personally without restricting the freedom of expression rights protected by the Constitution of the Republic of Türkiye.

2. SCOPE

All members of the Board of Directors, executives and employees within Doğan Group along with third parties acting on behalf of Doğan Group are required to comply with this Policy, which provides the guidelines for upholding the corporate brand values, across all social media channels.

The Social Media Use Policy is an integral part of the Doğan Group Code of Ethics and Business Conduct and other corporate policies approved by the Board of Directors and disclosed to the public.

3. DEFINITIONS and ABBREVIATIONS

Specific terms, expressions, concepts and abbreviations used in this Policy are briefly explained herein.

“Doğan Group” – Refers to the companies directly or indirectly controlled by Doğan Şirketler Grubu Holding A.Ş. (*Doğan Holding*) and the joint ventures included in Doğan Holding’s consolidated financial statements.

“Social Media” – Refers to the digital mediums that enable publicly sharing information, images, opinions, comments, etc.

4. ROLES and RESPONSIBILITIES

The Corporate Communications and Sustainability Department is responsible for drafting, developing, enforcing, and updating the Policy, which becomes effective upon the Executive Committee’s resolution.

Doğan Group employees may reach out to the Corporate Communications and Sustainability Group at Doğan Holding for any inquiries regarding this policy and its implementation.

The Corporate Communications and Sustainability Group is responsible for opening, closing and suspending Doğan Holding’s social media accounts as well as managing the social media content. The responsibility for opening, closing and suspending social media accounts of the Doğan Holding subsidiaries and managing their social media content falls on the corporate communications or relevant functions of the respective companies.



Doğan Group recognizes that social media applications bring a host of opportunities in terms of promoting our business. Therefore the Group adopts the principle of leveraging such opportunities effectively and responsibly. All the individuals covered within the scope of this Policy are required to know and uphold the applicable laws and regulations, Doğan Group Code of Ethics and Business Conduct, corporate policies and practices during their use of social media.

Doğan Group employees are encouraged to report any violations of this policy on social media platforms by email to the ethics line at etik@doganholding.com.tr.

5. IMPLEMENTATION PRINCIPLES and GUIDELINES

5.1. Key Guidelines for Social Media Use

Doğan Group employees and third parties acting on behalf of Doğan Group are responsible for following the key guidelines and standards below when using social media.

- We uphold Doğan Group Code of Ethics and Business Conduct, corporate policies and the applicable laws and regulations.
- We exercise prudence and responsibility during our use of social media.
- We diligently protect corporate information assets and confidential information.
- We strictly observe the privacy of personal data.
- We respect the intellectual property and commercial rights of third parties and abide by the applicable laws.

5.2. Guidelines for the Use of Social Media as a Job Requirement

Employees and third parties acting on behalf of Doğan Group that use social media as part of their duties are responsible for following the guidelines and standards below.

- We consider the potential risks in social media or web communications and approach the task with project management discipline.
- We follow specific guidelines when posting content on behalf of Doğan Group companies and speaking for Doğan Group.
 - We uphold ethical rules, corporate policies and procedures. We always act with respect for fundamental values, religion, ethnicity, culture, age and gender.
 - We fully adhere to Personal Data Protection Regulation (KVKK) legislation for collecting and using personal data.
 - We make sure that our posts are relevant, accurate and honest, ensuring not to share misleading information.
 - We expressly indicate our position and the company for which we are posting content.



- We never post confidential corporate information.
- We do not use corporate email login credentials and passwords in corporate social media accounts.
- We avoid conflicts with the representatives of competitors on social media or forums and do not engage with the accounts managed by the competitors in the industries in which we operate.

5.3. Guidelines for the Employees' Use of Social Media

Doğan Group employees are expected to understand that their personal activities on social media may, in certain cases, affect the businesses they represent as part of their duties. The guidelines and standards to follow in non-business personal social media use are explained below.

- We abide by Doğan Group's Code of Ethics and Business Conduct, as well as the applicable corporate policies in our social media posts. As emphasized in Doğan Group's Human Rights Policy, we do not tolerate discrimination based on race, ethnicity, social origin, religion, gender, age, skin color, disability or political opinion. Doğan Group employees adhere to these core values in their personal social media use.
- We expect the employees to include a disclaimer that all the opinions and information they post to social media reflect their personal views and do not bind their companies. The employees are also required to act with full knowledge that all responsibility lies with them.
- Only the individuals authorized as company spokespersons are allowed to speak, post and make official statements on behalf of Doğan Group on social media. The employees may post any publicly available information about the company to their personal social media accounts, provided that the content is shared as the one presented in the official social media and communication channels of the organization with a disclaimer that it is quoted from those channels.
- To avoid the impression that all content shared on social media channels where the corporate identity is visible also represents the organization, no political content can be posted.
- We expressly state our position as Doğan Group employees when posting content regarding Doğan Group or its products and services on our personal social media accounts.
- We use our personal email in our social media accounts, not our corporate email address.
- When downloading applications to computers or mobile devices used for business purposes, we do not allow the transfer of confidential or proprietary information,



defined in company policies, to third-party social networks (e.g. Facebook, LinkedIn, etc.), other websites or online databases.

- We use social media and technology responsibly.
- We never disclose confidential information belonging to Doğan Group.

6. EFFECT

The Social Media Use Policy has become effective upon the resolution of Doğan Holding Executive Committee on 5 February 2024.