



DOĞAN GROUP

HUMAN RIGHTS POLICY



1. OBJECTIVE

The objective of this policy is to emphasize the significance of upholding fundamental human rights and valuing our employees within the operations of the Doğan Group. This policy aims to outline our standard practices in this regard.

2. SCOPE

Doğan Group requires all members of its Board of Directors, executives and employees to adhere to this policy. Additionally, the company expects its business partners and suppliers to act in accordance with this policy to the extent applicable for relevant parties and activities.

The Human Rights Policy constitutes an integral component of the Doğan Group Code of Ethics, Code of Conduct and other corporate policies, all 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.

“UN” – United Nations

“UN Guiding Principles on Business and Human Rights” – The UNGPs are the world’s most authoritative, normative framework guiding responsible business conduct and addressing human rights abuses in business operations and global supply chains.

“UN Global Compact” – By incorporating the Ten Principles of the UN Global Compact into their strategies, policies and procedures, companies commit to meeting fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption.

“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.

“ILO” – International Labour Organization

“Women's Empowerment Principles (WEPs)” – Established by UN Women and UN Global Compact, the WEPs are a set of principles offering guidance to businesses on how to advance gender equality and women’s empowerment in the workplace, marketplace and community.



4. ROLES AND RESPONSIBILITIES

The Human Resources Group is responsible for drafting, developing, executing and updating the Policy, which becomes effective upon the Board of Directors resolution based on the Executive Committee's evaluation.

All employees and stakeholders may report any incident in violation of this policy, applicable legislation and Doğan Group Code of Ethics to etik@doganholding.com.tr.

Doğan Group employees may consult Doğan Holding Human Resources Group about these policies and practices.

5. IMPLEMENTATION PRINCIPLES

At Doğan Group, we care about our people, our country and humankind and strive to add value to society, our world and our common future.

Doğan Group's Human Rights Policy is informed and guided by the fundamental international labor and human rights standards, including Universal Declaration of Human Rights (1948), ILO Declaration on Fundamental Principles and Rights at Work (1998), UN Global Compact (2000), UN Guiding Principles on Business and Human Rights (2011) and the Women's Empowerment Principles (2011). At Doğan Group, our relations with our employees, suppliers, business partners and society are founded on our Human Rights policy. Similarly, we encourage our business partners to embrace the same sensibilities.

DISCRIMINATION

We do not tolerate any form of discrimination based on race, ethnicity, social origin, religion, gender, age, skin color, disability or political opinion for our Board of Directors and all employees of the Holding and group companies. No disrespect or harassment based on personal characteristics or differences is accepted. We strive to foster a fair work environment to ensure our employees are not subjected to any discrimination.

DIVERSITY AND INCLUSION

We appreciate the differences of our employees and strive to create an inclusive environment at Doğan. We champion equal opportunity and ground our decisions in recruitment, compensation, employee development and promotions on individual performance, potential and experience.

Our goal is to foster diversity in the workforce, leveraging varied backgrounds and experiences for the benefit of our organization.

CHILD LABOR, FORCED LABOR and HUMAN TRAFFICKING

Safeguarding children's right to education holds particular significance for Doğan Group. Therefore, we strongly condemn child labor that could infringe upon this right and result in



physical and mental harm to children. We expressly prohibit the employment of individuals under the age of 18 in heavy and hazardous work.

We categorically reject all forms of forced labor and modern slavery.

In alignment with the international conventions we have adopted, including ILO Declaration on Fundamental Principles and Rights at Work and UN Global Compact, we do not tolerate forced labor and child labor and expect our business partners to exercise the same sensibilities.

HARASSMENT and VIOLENCE

We are committed to providing a safe work environment free from violence, harassment and threats.

We have a zero-tolerance policy for any infringement on personal immunity, including physical, sexual and/or emotional harassment against our employees or stakeholders with whom we maintain a business relationship—whether in the workplace or any other business-related location. We unequivocally condemn any aggressive actions that could compromise individuals' right to immunity or jeopardize their physical and mental well-being. Verbal violence, including fighting, is strictly prohibited.

Moreover, we stand firm against premeditated behaviors intended to alienate individuals from their work, diminish their performance or coerce them into resignation, all of which can be recognized as forms of mobbing.

FREEDOM OF ASSOCIATION

We respect the right of Doğan Group employees to join or not join a union without the fear of retaliations or threats.

We are committed to fostering a constructive dialogue with the freely elected representatives of our employees who are affiliated with a legally recognized labor union.

OCCUPATIONAL HEALTH AND SAFETY

Our commitment involves adhering to the stipulations of applicable legislation, identifying potential risks, implementing preventive measures and ensuring continued compliance with both legal requirements and company procedures through regular inspections. This approach serves as the cornerstone of our policy, safeguarding the health of our employees and ensuring workplace safety.

We are dedicated to creating and maintaining a safe and healthy workplace.

WORKING HOURS and COMPENSATION



We adhere to the maximum working hours stipulated by the legislation in the countries where we operate. Our concern is to ensure that our employees utilize their legal leaves and maintain a healthy work-life balance.

Our remuneration and benefits policy is formulated with a competitive approach, aligning with industry dynamics, the local labor market and the terms outlined in valid collective bargaining agreements.

6. RESOURCES

Universal Declaration of Human Rights

[Universal Declaration of Human Rights | United Nations](#)

ILO Declaration on Fundamental Principles and Rights at Work

[ILO Declaration on Fundamental Principles and Rights at Work \(DECLARATION\)](#)

UN Global Compact

[The Ten Principles | UN Global Compact](#)

UN Guiding Principles on Business and Human Rights

[GuidingPrinciplesBusinessHR_EN.pdf \(ohchr.org\)](#)

Women's Empowerment Principles (WEPs)

[About | WEPs](#)

7. EFFECT

The Human Rights Policy has become effective upon the resolution of Doğan Holding Board of Directors on 20 December 2023.