

1. INTRODUCTION

Doğuş Holding aims to contribute to long-term value creation by integrating the expectations of international sustainability standards into its investment strategy and ensuring that its investments take into account the Company's material issues across environmental, social, and governance (ESG) dimensions.

This policy sets out our responsible investment approach, aligned with global sustainability standards guided by the United Nations Principles for Responsible Investment (UN PRI)

2. OBJECTIVES:

The objectives of the Doğuş Holding A.Ş. Responsible Investment Policy are defined to ensure that our investment activities not only generate financial returns but also create positive contributions to society and the environment. The core objectives of this policy include Long-Term Value Creation, Risk Management, and Stakeholder Engagement.

i. Creating Sustainable and Long-Term Value by Investing in Companies with a Strategic Approach to ESG Issues.

Our approach of investing in companies with strong environmental, social, and governance (ESG) strategies, targets, and practices aims to ensure the long-term sustainability of our investments. Within this scope, the companies we consider are those that are capable of managing ESG-related risks and of evaluating the opportunities arising from these risks in a more strategic manner. Over time, this potential may lead to outcomes that are positively reflected in the company's financial performance.

Companies with a Strategic Approach to ESG Issues:

These are companies that actively manage their environmental impact, demonstrate a high level of social awareness, and possess robust corporate governance structures. By investing in such companies, Doğuş Holding supports enterprises that make positive contributions to society and the environment, while also acknowledging its role as a significant contributor to sustainable development.

Positive Impact: Companies that have identified their ESG-related risks and integrated these risks into up-to-date risk management models are generally regarded, in line with international standards, as more resilient, innovative, and efficient. In addition, such companies typically have easier access to financial resources and are assessed as having minimal reputational risk. Based on academic studies and analyses conducted on stakeholder expectations, organizations with high levels of customer loyalty also commonly emerge among these companies, which in turn enhances their potential for long-term value creation.

ii. Creating Sustainable Value and Reducing Risks by Investing in Companies with Decent ESG Performance.

With the intent to better manage the risks of the companies in which we invest and to identify opportunities related to these risks, we require these companies to integrate ESG factors into their risk management models and review these models according to this framework

iii. Promoting Transparency and Accountability with Stakeholders through Active Dialogue Platforms.

This Policy applies to all direct and indirect investments made by Doğuş Holding across a wide range of industries, including but not limited to automotive, restaurants, hotels, tourism, retail, and others. The Policy covers the entire investment life cycle, encompassing all stages from pre-assessment and due diligence to contractual processes, ownership phases commencing with the transfer of operations to Doğuş Holding, and, where applicable, divestment processes.

In implementing its Sustainable Investment Policy, Doğuş Holding continues to engage in dialogue not only with its key stakeholders but across all stakeholders, through various platforms to be able to understand their concerns and expectations regarding ESG matters. In the similar manner, it encourages its subsidiaries to manage their own stakeholder engagement processes and to report their relevant activities accordingly.

3. CORE PRINCIPLES

- Adopting a long-term investment approach,
- Integrating ESG factors into traditional financial due diligence processes to be able to better understand and appreciate risks and opportunities,
- Ensuring compliance with international standards and codes, as well as applicable laws and regulations,
- Incorporating ESG-related risks into the risk management framework to be able to detect, assess, and mitigate potential risks that may affect the financial and non-financial performance of investments,
- Collaborating with other investors, industry associations, and stakeholders to promote responsible investment practices and to advocate for legislative and policy developments that support sustainability,
- Ensuring that all investment activities are conducted in line with high ethical standards, including the avoidance of bribery, corruption, and unethical conduct.

4. RESPONSIBLE INVESTMENT APPROACH

4.1. Exclusion Conditions / Screening Processes:

Doğuş Holding does not invest in companies engaged in controversial weapons, tobacco, adult entertainment, gambling, non-medical cannabis production, predatory lending¹ activities, or businesses with fossil fuel operations. Companies that do not have a credible carbon emissions reduction plan and that generate significant adverse social or environmental impact are also assessed within this scope and excluded from investment plans.

4.2. Positive Screening / Best-in-Class Approach:

In addition to other criteria considered when making investment decisions, Doğuş Holding A.Ş. prioritizes companies with sustainable business models and strong environmental, social, and governance (ESG) performances. In general, the goal is, the affiliates and subsidiaries that exceed the sustainability assessment and reporting criteria² defined for the Company's investment portfolio to obtain an ESG rating³ within a maximum of three years, and this rating to be classified as low risk, based on the minimum weighted average ESG ratings.

4.3. ESG say in Voting Rights and Decision-Making Processes:

To be able to promote improved sustainability performance and enhanced corporate transparency, Doğuş Holding maintains close dialogue with its affiliates and subsidiaries on ESG-related matters. Within this framework, and where deemed necessary, it exercises its voting rights in proportion to its shareholding to support investment plans, appointments, and targets related to ESG issues and to endorse best practices in corporate governance.

4.4. Climate Change Strategy: Doğuş Holding A.Ş. commits to reducing the carbon footprint of its investment portfolio in alignment with the objectives of the Paris Agreement. Within this scope, it encourages green and sustainable investments to be able to support the transition to a low-carbon economy to the greatest extent possible.

¹ Predatory lending refers to loans in which unfair, deceptive, fraudulent, or unethical practices are employed by lending institutions during the loan origination process. While there is no internationally standardized legal definition of predatory lending, a 2006 audit report issued by the Office of Inspector General of the U.S. Federal Deposit Insurance Corporation (FDIC) broadly defines predatory lending as "imposing unfair and abusive loan terms on borrowers," although the terms "unfair" and "abusive" are not specifically defined.

² As of 31 December 2023, these are companies with revenues exceeding TRY 100 million and employing more than 200 employees.

³ Obtaining ratings from recognized sustainability rating agencies such as MSCI, Sustainalytics, and FTSE4Good is encouraged.

4.5. Responsibilities and Roles:

Responsibility of the Board of Director: Doğuş Holding Yönetim Kurulu Yatırım Politikasının onaylanmasından, iştirak ve bağlı ortaklıklara atanmış bir üst yönetici ya da Yönetim Kurulu Başkanı tarafından duyurulmasından ve yıllık olarak gözden geçirilmesinden sorumludur.

Responsibilities of Senior Executives: Doğuş Holding A.Ş. ensures that this Policy is applied in the daily business activities of its employees. Senior executives of the Company are responsible for understanding this investment approach and for effectively incorporating it to be used in decision-making processes.

Investments Department: This department is responsible for integrating the Policy into investment and decision-making processes, as well as for its monitoring and implementation.

Through responsible investment practices, Doğuş Holding is committed to promoting a sustainable future both within its subsidiaries and affiliates and across the regions and countries in which it operates. This Policy also reflects our commitment to engaging in dialogue and cooperation with Group Companies to be able to integrate ESG factors into our investment processes and to encourage long-term value creation.

Doğuş Holding, as it does with its other policies, regularly reviews its Responsible Investment Policy in line with changing conditions and requirements, and makes the necessary updates.

5. ENFORCEMENT

This Policy was approved by the Doğuş Holding Board of Directors on 28 November 2024 and publicly disclosed. It enters into force as of the date of its approval by the Doğuş Holding A.Ş. Board of Directors. Together with its related procedures, it is reviewed as necessary, and any required updates are made and communicated to the relevant parties accordingly.

APPENDIC 1. EXCLUDED INDUSTRIES AND ACTIVITIES

To ensure compliance with Doğuş Holding's commitment to responsible investment, in line with both the United Nations Principles for Responsible Investment (UN PRI) and sustainability-oriented frameworks, the following industries and practices are excluded from the scope of potential investments:

- 1. Controversial Weapons:** Companies involved in the production or distribution of weapons with significant adverse social impact, including landmines, cluster munitions, and nuclear weapons.

2. **Tobacco Production:** Any entity engaged in the production or distribution of tobacco products.
3. **Adult Entertainment:** Companies involved in the production or distribution of sexually explicit content and materials intended for adults.
4. **Gambling:** Companies operating within the gambling industry, including casinos, online gambling platforms, and betting services.
5. **Cannabis for Non-Medical Purposes:** Organizations focused on the production, distribution, or retail sale of cannabis for purposes other than medically regulated uses.
6. **Predatory Lending:** Companies engaged in predatory lending practices that impose unfair or abusive credit terms on borrowers.
7. **Fossil Fuels:** Investments in companies focused on the extraction, processing, or distribution of fossil fuels, including oil, coal, and natural gas, unless they have a credible, realistic, and implementable emissions reduction plan aligned with the objectives of the Paris Agreement
8. **Companies with Adverse Social or Environmental Impact:** All companies with significant, documented negative impact on society or the environment that lack corrective actions or remediation plans.

This exclusion list forms an integral part of Doğuş Holding's responsible investment policy and reflects its commitment to sustainability, ethical business practices, and long-term value creation.