

1. PURPOSE

The Doğuş Holding A.Ş. Sustainable Procurement Policy has been prepared to define the principles that our Company takes into account in managing all procurement activities and is shared as a publicly accessible document.

Doğuş Holding Sustainable Procurement Policy was developed to encompass all processes, with a particular attention to ensure procurement decisions are aligned with the Company's long-term value creation vision and sustainability commitments.

Taking into account global best practices, the policy aims to clearly express our core principles and corporate approach to operations designed to reduce risks and leverage opportunities across the supply chain while enhancing financial, social, and environmental performance.

2. SCOPE

This policy applies to all subsidiaries and group companies operating under the Doğuş Holding A.Ş. portfolio. While supporting sustainable growth, the Doğuş Holding Sustainable Procurement Policy seeks to cultivate awareness in managing risks related to environmental, social, and governance (ESG) matters, and to guide the procurement strategies of companies across all industries in which we operate by establishing a supply chain aligned with global standards.

3. SUSTAINABLE PROCUREMENT PRINCIPLES

The following principles shall guide all procurement decisions in Doğuş Holding A.Ş.'s purchasing processes and shall support the implementation of an action plan consistent with market sustainability goals in line with the Company's investment strategies.

- In accordance with our procurement policy, we prioritize long-term value creation over short-term cost savings by focusing on processes that foster innovative ideas. Consequently, we encourage Doğuş Holding group companies to source products and services from suppliers with robust sustainability programs and urge them to actively reduce their carbon footprint.
- Our procurement process involves a comprehensive assessment of suppliers' environmental, social, and governance performance. We carry out supplier evaluation processes to determine their major ESG risks such as human rights violations, work environment-related misapplications, and their environmental impact assessments throughout their corporate lifecycle; if we deem necessary, we implement self-assessment and audit processes to mitigate these impacts, thereby reinforcing our regulatory role.

- Doğuş Holding A.Ş. also expects its suppliers to maintain transparency throughout their supply chains. In high-risk sectors—particularly those with significant environmental and social impacts—traceability of products and services in compliance with sustainability standards is of utmost importance. Our suppliers can ensure compliance with these principles by disclosing their sustainability practices and adhering to international frameworks such as the UN Global Compact and the OECD Guidelines.

3.1. Procurement Principles Associated with Environmental Issues

- In our procurement decisions giving precedence to suppliers that minimize their environmental footprints by undertaking initiatives such as reducing their greenhouse gas emissions, promoting circular economy practices (e.g., reusability, recycling), and lowering water and energy consumption are among our fundamental principles.
- Doğuş Holding A.Ş. places the procurement of goods and services that efficiently utilize natural resources at the core of its procurement policy. This approach, in addition to adopting low-carbon, energy-efficient technologies, may include goods and services that provide innovative solutions for resource recovery, as well as alternative recycling opportunities.
- We prioritize the procurement of materials with low environmental impact—such as certified renewable, recyclable, or biodegradable resources. Our Procurement Policy also promotes the avoidance of conflict minerals and any resources proven to have adverse effects on biodiversity, as defined by international standards.
- Especially those conduct their business in industries with higher environmental impact, we invite our suppliers to minimize their waste generation, adopt zero-waste storage practices, and disclose action plans for emissions reduction.

3.2. Procurement Principles Associated with Community Development

- Doğuş Holding A.Ş. expects its suppliers to comply with international labor standards, including those set by the International Labor Organization (ILO). These expectations primarily include fair remuneration, laws and regulations-compliant working hours, prevention of all forms of discrimination, and full assurance of occupational health and safety.
- Our suppliers are expected to promote diversity not only in their workplaces but in their management practices as well. As Doğuş Holding A.Ş. and its subsidiaries, we consider supporting small and medium-sized enterprises (SMEs), minority-owned businesses, and women-owned businesses among our strategic priorities to foster local economic development.

- We regard those suppliers highly who contribute to the communities in which they operate by maintaining ethical relationships with local stakeholders, promoting local employment, and engaging in community investments.

3.3. Procurement Principles Associated With Economic Development

- At Doğuş Holding A.Ş., our procurement approach considers not only immediate costs but also the total cost of ownership of the goods or services to be procured, including long-term environmental and social costs. We particularly emphasize ensuring that procurements are not based on short-term gains but are aligned with long-term financial and sustainability objectives, whereby managing our procurement processes in line with this understanding.
- We support our group companies in developing collaborative supplier relationships that foster innovative solutions which enable them to achieve their sustainability goals. Given the wide scope of sustainability topics and as each industry necessitates its own sector-specific considerations, all industries should focus on decarbonization, circular economy requirements, working conditions, and the development of new sustainable technologies at the initial stage.
- We select our suppliers based on comprehensive risk assessments that consider ESG factors such as legislative changes, supply chain disruptions, and reputational risks. As recommended by international standards, we also evaluate the transition strategies of our product and service providers to ensure their resilience to climate-related risks.

3.4. Business Ethics Considerations in Procurement Processes

- In tender processes Doğuş Holding A.Ş. upholds being transparent and accountable and avoiding corruption, bribery, and all unethical conducts as a core principle and duly complies. All procurement decisions made on behalf of Doğuş Holding A.Ş. must be auditable, documented, and justified based on clearly defined criteria. All procurement transactions, including those carried out through D-Serve (Doğuş Efficiency and Central Procurement Services Trade Inc.), must be executed in accordance with established procurement and tender procedures and remain auditable via contractual authorization.
- Doğuş Holding A.Ş. and all its group companies aim to ensure the traceability of the procured goods and services throughout the entire supply chain. With this respect, our suppliers are encouraged to transparently report their sustainability performance in line with regulatory frameworks such as the TSRS (Turkish Sustainability Reporting Standards) and the CSRD (Corporate Sustainability Reporting Directive) adopted by the European Commission in 2024.

- As in all its managerial processes, Doğuş Holding A.Ş. is committed to operating its procurement activities in accordance with this policy and the principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the Paris Agreement on climate change mitigation.

4. SUPPLIER DEVELOPMENT AND DIALOGUE PLATFORMS

Doğuş Holding A.Ş. considers its suppliers—who provide the goods and services necessary for its operations—as business partners and values their development. The Company, particularly regarding matters that are addressed within the framework of risk management, monitors the performance and improvement efforts of suppliers posing business continuity risks through audits.

Doğuş Holding A.Ş. expects each of its suppliers to manage their processes in alignment with the principles set forth in this policy. Furthermore, our group companies are expected to encourage and support their suppliers in ensuring compliance with these principles and, where necessary, in implementing improvements.

5. MONITORING, REPORTING, AND AUDITING

Doğuş Holding A.Ş. encourages its group companies to improve their sustainability performance and provides support through its policies for suppliers to initiate their ESG compliance and CSRD alignment efforts. While Doğuş Holding A.Ş. is responsible for its own procurement processes, it also audits the compliance of its subsidiaries and affiliates with this policy and provides audit reports to relevant companies for necessary adjustments to be made.

The aspects ensuring compliance with this policy are integrated into the internal audit processes of Doğuş Holding A.Ş. In addition, business partners identified as high-risk suppliers following risk assessments are subject to audits conducted by procurement units or by D-Serve, which is authorized for procurement activities. Doğuş Holding may also assess the sustainability performance of high-risk suppliers and request corrective actions when necessary.

6. IMPLEMENTATION AND REVIEW

Doğuş Holding A.Ş. expects its subsidiaries and affiliates to integrate these principles into their procurement processes. Each company is expected to develop its own procurement strategy under this policy, which will be monitored by Doğuş Holding's central sustainability and audit teams. Doğuş Holding A.Ş. emphasizes the importance of its group companies' adherence to international risk management standards in sustainable supply chain management and closely monitors this alignment. The Doğuş Holding A.Ş. Sustainable Procurement Policy is reviewed every two years, or as needed, to reflect evolving global standards, legislative updates, and emerging sustainability expectations.

7. ENFORCEMENT

This policy was approved by the Board of Directors of Doğuş Holding on 28 November 2025 and publicly disclosed. It entered into force as of the date of its approval by the Board of Directors of Doğuş Holding A.Ş. Together with its associated procedures, the policy is reviewed as required, and any necessary updates are made and communicated to the relevant stakeholders accordingly.