

1. PURPOSE

The purpose of this policy, prepared in line with Doğuş Holding’s community engagement strategy and the United Nations Sustainable Development Goals, is to set out our Company’s internal criteria that will guide decision-making processes regarding the level of support to be granted to social initiatives, corporate donations made for charitable purposes, and responses to sponsorship requests, in full compliance with all relevant national and international laws and regulations. Doğuş Holding is directly concerned with the welfare, and the economic and social development, of the communities in which it operates. We are committed to standing alongside civil society organizations that work to enhance the well-being of these communities, and we regard our corporate donations as an important part of our long-term commitment to their continuous development.

For the purposes of this policy, “donation” is defined as any item of value voluntarily given to third parties without expecting anything in return. A donation may take the form of time, products, financial support, services, or the sharing of access to our companies’ services in areas lacking such resources. Likewise, within the scope of this policy, “sponsorship” refers to the support or financing of an activity that pursues social benefit, generally in exchange for advertising, promotion, marketing, or similar advantages. We only provide donations, aids, and sponsorships that generate social benefit, and we regard this criterion as material.

2. SCOPE

This policy applies to Doğuş Holding, its subsidiaries and affiliates, and related parties worldwide, including senior executives, full-time, part-time, contracted, and temporary employees. The term “work performed” within this policy encompasses all aspects of corporate transactions, activities, and commercial endeavors.

3. LAWS AND REGULATIONS

Doğuş Holding is committed to managing all its processes fairly and in accordance with ethical business practices. The Company is determined to avoid any form of corruption, including potential misappropriations of corporate donations, aids, and sponsorships.

Doğuş Holding undertakes to review whether any solution partnership, monetary, or in-kind support request complies with international and local laws, and to ensure that all elements are considered to prevent any concern that may arise regarding donations or contributions, as well as any doubts among stakeholders about how and where the transferred resources are used.

4. RESPONSIBILITIES AND PRINCIPLES

All donations and sponsorships by Doğuş Holding must be made under a written agreement that specifies the amount or value, payment plan (if applicable), and any conditions or restrictions related to the use of the donated funds or resources. Moreover, all transactions forming part of a donation or sponsorship must be auditable, and all provided support must be similarly documented.

Employees of Doğuş Holding and Doğuş Group companies are responsible for safeguarding corporate values and conducting their work with honesty and integrity. Doğuş Holding manages all corporate relationships in line with the following fair and ethical business practices:

- All managers and employees must remain alert to potential violations or situations that may indicate wrongdoing or risk, whether by another employee or a related party, and must report such issues as necessary.
- Employees and related parties within group companies are corroborated in complying with this policy, and mechanisms that promote compliance are established and maintained.
- All donation, aid and sponsorship requests are reviewed and approved by the Sustainability Committee reporting directly to the Board of Directors.
- Employees may not, under any circumstances, make monetary or in-kind support commitments on behalf of Doğuş Holding without prior approval from the Sustainability Committee.

5. VIOLATIONS

If any relevant party encounters a problem, concern, or suspicion of a violation of this policy, they must report it to the Doğuş Holding Sustainability Manager or the Legal Department.

6. INCONGRUITY

Doğuş Holding does not provide donations, aids, or sponsorships to the following entities:

- Institutions or organizations that do not address social issues, that do not carry out programs inclusive of all segments of society, or that represent a single belief.
- Organizations that engage in discrimination based on race, gender, belief, or

other individual conditions or preferences.

- Politicians, political parties, or institutions and organizations affiliated with or related to political parties.
- Projects, programs, or activities that are incompatible with or create conflicts of interest with Doğuş Holding's current investments or programs carried out by Group companies.
- Activities that contradict Doğuş Holding's corporate values, policies, or strategies.
- Activities that may create conflicts of interest or are inconsistent with governmental policies in the countries where we operate.
- Activities that may harm the health or safety of any individuals, organizations, communities, or the ecological environment.
- Activities organized by political parties and/or supporting political agendas.

7. IMPLEMENTATION

This policy is implemented locally and regionally, in accordance with local and project-based requirements in the regions where Doğuş Holding operates, invests, or maintains affiliates. Legislation and cultural expectations regarding donations, sponsorships, and other monetary or in-kind contributions by Doğuş Group companies may differ significantly across various regions of the world where we operate. This delegated approach to implementation supports our subsidiaries and affiliates in acting and making decisions based on strategies consistent with their own donation and aid policies within this framework.

8. ENFORCEMENT

This Policy was approved by the Board of Directors of Doğuş Holding on 03 May 2025 and publicly disclosed. It enters into force as of the date of its approval by the Board of Directors of Doğuş Holding A.Ş. Together with its related procedures, it is reviewed when necessary, updated as required, and the relevant parties are duly informed accordingly.