

1. PURPOSE

This policy has been developed to set forth Doğuş Holding's corporate approach to human rights, and to establish the principles of recognizing and respecting human rights that are applicable across the entire organization, including its subsidiaries and affiliates.

2. SCOPE

Doğuş Holding Human Rights Policy is applicable to Doğuş Holding employees, as well as the workforce of its subsidiaries and affiliates, business partners, suppliers, and all its stakeholders across the value chain.

3. REFERENCES

- UN Guiding Principles on Business and Human Rights (UNGPs)
- Universal Declaration of Human Rights
- ILO Core Labor Standards
- OECD Guidelines for Multinational Enterprises
- UN Global Compact Principles
- Constitution of the Republic of Turkey and all other relevant legislation

4. CORE PRINCIPLES

Doğuş Holding:

- Embraces respect for human rights as an integral component of its corporate culture.
- Does not permit any form of discrimination in the activities of Doğuş Group Companies (including but not limited to race, gender, age, disability, belief, opinion, or ethnic origin).
- Strictly rejects any practice of child labor, forced labor, and all forms of modern slavery.
- Respects employees' union rights in accordance with the Constitution of the Republic of Turkey.
- Is committed to providing a safe and healthful working environment for all employees, subcontractors, and contractor.
- Conducts its operations in a manner that does not harm the land, water, environment, or the livelihood of local communities in the regions where Doğuş Group Companies operate, in compliance with universal human rights.
- Expects the same principles to be upheld throughout its value chain, including the supply chain, and reserves the right to audit its suppliers in this regard.

5. IMPLEMENTATION COMMITMENTS

Across all its operations, Doğuş Holding regards the proactive identification and proper management of human rights risks as a fundamental responsibility. To this end, it ensures that, from investments to daily operations, human rights impact assessments are conducted at every stage of its activities and that preventive measures are implemented to avoid potential violations. The Holding prioritizes the establishment of an accessible, independent, and impartial grievance mechanism through which employees, suppliers, and other stakeholders can safely report any violations. This mechanism also ensures that grievances are resolved effectively and reported transparently.

In addition, Doğuş Holding also undertakes to measure its human rights performance regularly, to manage it in alignment with international standards, and to publicly disclose progress made on relevant issues.

Human rights criteria are treated as binding rudiments in all procurement and supply processes. Compliance of business partners and suppliers with these principles is required, and the right to audit them when necessary is reserved.

Regular training programs are provided to employees and managers to raise awareness, ensuring that respect for human rights becomes a permanent factor of the corporate culture.

6. GOVERNANCE AND RESPONSIBILITIES

The implementation of this policy is under the responsibility of the Sustainability Committee reporting to the Board of Directors of Doğuş Holding. The boards of directors of all subsidiaries are responsible for ensuring that the practices under this policy are effectively implemented within their organizations.

7. MONITORING AND REVIEWING

The policy is reviewed periodically in line with stakeholder feedback, as well as developments in national legislation, and international standards, and updated when deemed necessary.

8. ENFORCEMENT

This Policy was approved by the Board of Directors of Doğuş Holding on 24 December 2025 and publicly disclosed. It entered into force as of the date of 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.