



United Nations Global Compact Communication on Progress



KNOWS
AND
CREATES
VALUE

Statement of Continued Support
Message from Çağlar Göğüş, Executive Director and Chief Executive Officer

05 May 2021

To our stakeholders:

At Doğan Group, we know that no action is limited to its initial point of impact. A single action can snowball into a movement, and even a single drop of water can affect a vast ocean, just as an idea can shape the future and one person can influence society at large.

With this awareness, we have designed all stages of our operations to align with the United Nations 2030 Sustainable Development Goals. We benefit our planet by taking concrete steps against climate change, and add value to society by championing equality and local production while also committing to continuously pursue innovation in order to secure a better future for all of us.

In order to make this dream come true, we set out with a new approach within the framework of our responsibility, and we implement a “responsible holding” approach with the Doğan Impact Plan we designed. Supporting the circular economy, fulfilling and going beyond our responsibilities regarding ecological crises, laying the foundations for a more confident and inclusive society, and designing the future we dream of as a result of all these are the main components of our dream. In order to reach these, we invite you to work, produce, fix and repair together.

With the Doğan Impact Plan, we aim to facilitate our group companies to improve their environmental, social and governance performance. In this way, we will work to create environmental and social benefits and to make this positive effect sustainable. Our roadmap that will emerge for this purpose will guide us from what actions we will proceed to achieve what goals, what we need to follow and which new approaches we need to adopt. Thus, we will follow the performance of our companies in environmental, social and governance issues, and reveal the possibilities for improvement and creating greater benefits.

Through annual reports, we will observe progress in our three core value areas: investment in the world, investment in the inclusive society and investment in the future. Our understanding of investment, which we have designed in the light of the United Nations Responsible Investment Principles, will guide both the Holding and group companies to achieve sustainability and go beyond.

In this context, I am pleased to confirm that Doğan Holding reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our commitments to continually improve the integration of the Global Compact and its principles into our business strategy, way of doing business, culture and daily operations. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Thank you in advance for your contribution to a good future that we will jointly design.

Sincerely yours,
Çağlar Göğüş



The following table provides an overview of how Doğan Holding has implemented the Ten Principles across our business and service lines.

UN Global
Compact Principle

Disclosure & Highlights

Public Documents That
Underscore Our Commitment

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: make sure that they are not complicit in human rights abuses.

As Doğan Holding, we recognize that human rights are an integral part of corporate citizenship and we respect and support the Universal Declaration of Human Rights and the Guiding Principles on Business and Human Rights.

We have formally outlined the human rights principles we believe in and the commitments we have made via **Doğan Group Human Rights Policy** statement, publicly disclosed on the corporate website. This statement serves to align decision-making and activities across Doğan Group and addresses issues related to non-discrimination and diversity in personnel practices, health and safety, anti-harrasment and freedom of association.

- We make sure we treat our employees equally, presenting them equal opportunities without discrimination on the basis of religion, language, race, age, skin colour, nationality, or social origin, and gender. In our Group, human resources selection, hiring, placement, training, and remuneration processes are carried out taking as the basis qualifications, performance, skills, and experience.
- As the Doğan Group, in line with our principle of “equal pay for equal jobs”, we are very sensitive about presenting equal salary opportunities for our employees, and competitive advantages within the scope of the market conditions.
- We are committed to present a safe working environment for our employees, away from all harassment, abuse, exploitation, and violence.
- We place importance in enhancing health and safety in the work places we operate.
- We support the freedom of collective agreement, within the framework of the right of association, the right of organisation, and trade unions that are recognised by law.
- We do not tolerate mandatory or forced employment.
- We absolutely do not employ child labour within the Doğan Group,
- We do not discriminate in a way that is against the law at the work place.
- We make sure that human rights practices are included in the internal communication channels and training programs within the Doğan Group.
- We develop practices in compliance with the Occupational Health and Safety Legislation, and we make sure that our employees’ awareness is increased concerning these issues.

We have also formally outlined **Doğan Group Code of Ethics**, publicly disclosed on the corporate website, consisting of the principles that the employees of our company must comply with when fulfilling their duties, as well as the working order related principles. The objective of those principles is to establish a general framework of the basic rules that need to be complied with, and to prevent any disagreements and conflicts of interest which may arise between employees, business partners, customers, and our company. The Code of Ethics addresses conflicts of Interest, relations with stakeholders and flow of information.

Furthermore, **Doğan Group Supply Chain Management Policy**, publicly disclosed on the corporate website, also sets forth requirements that our suppliers must fulfil and adhere to in terms of human rights.

As the Doğan Group, our objective is to work with suppliers who respect human rights, who do not discriminate in any manner whatsoever, and who offer equal opportunities for their employees. Our suppliers must adhere to the valid legislation, and above all, with the working hours, and overtime rules. We expect our suppliers not to discriminate on grounds of race, gender, nationality, age, physical disability, association memberships, pregnancy or marital status.

We have not identified any instances of Doğan Group Companies causing or contributing to any adverse human rights incidents.

https://www.doganholding.com.tr/media/1718/dogan_holding_human_rights_policy.pdf

https://www.doganholding.com.tr/media/2071/dogan_holding_code_of_ethics.pdf

https://www.doganholding.com.tr/media/1992/20151030_doganholding_supply_chain_management_policy.pdf



LABOR STANDARDS

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

As mentioned in **Doğan Group Human Rights Policy**, we support the freedom of collective agreement, within the framework of the right of association, the right of organisation, and trade unions that are recognised by law; we do not tolerate mandatory or forced employment; we absolutely do not employ child labour within the Doğan Group.

We protect the fundamental labour rights of our employees in all our operations and act in accordance with the International Labor Organization (ILO) and the Turkish Labor Law No. 4857, which include preventing discrimination, child labor, forced labor, and providing freedom of association and collective bargaining. As a signatory of the United Nations Global Compact (UNGC), Doğan Holding also takes into account the requirements of international institutions as well as national legislation, while protecting human rights along our value chain with employees, suppliers and subcontractors by integrating the necessary clauses in our contracts.

As mentioned in **Doğan Group Human Resources Policy**, publicly disclosed on the corporate website, the most important capital of our Group is human resources and accordingly our main objective is to become an organisation that our employees are happy and proud to be part of. We are aware that a sustainable growth is only possible with the employee engagement and for this reason we aim to grow our Group with colleagues who are quick, proactive and responsible and having strategic thinking skills. Doğan Group's Human Resources aim for offering a competent and high standard services to all his shareholders by supporting them in a quick, efficient and fair manner and being an integrative and strategic business partner. For that purpose, Doğan Group strives for and commits itself to;

- a. Creating a suitable environment where the employees can improve themselves individually and professionally,
- b. Providing a suitable workplace to ensure a sustainable development,
- c. Regarding the personal differences of our employees as richness in terms of human resources and showing a fair approach in line with our code of ethics,
- d. Evaluating the employee performance by measuring it with objective criteria,
- e. Providing equal opportunities to employees in terms of development and training,
- f. Offering assignment, transfer and rotation opportunities within the Group in order to enable employee development and the organisational development,
- g. Creating a work environment where the code of ethics and general code of conducts are applied, and the balance between the personal and professional life is maintained,
- h. Rewarding the high performance, providing right and constructive feedbacks to the ones who have lower than expected performance and supporting them to be improved,
- i. Developing approaches to strengthen the employee motivation and commitment.

Furthermore, **Doğan Group Supply Chain Management Policy**, publicly disclosed on the corporate website, also sets forth requirements that our suppliers must fulfil and adhere to in terms of labor standards.

As the Doğan Group, we expect that manners of employment such as forced or mandatory employment, employment under slavery, employment during military service, and employment in prison should not be resorted to, and we expect all our suppliers to be sensitive in this matter. Our suppliers must not employ workers below the age limit defined in the legislation.

https://www.doganholding.com.tr/media/1718/dogan_holding_human_rights_policy.pdf

https://www.doganholding.com.tr/media/1717/dogan_holding_human_resources_policy.pdf

https://www.doganholding.com.tr/media/1992/20151030_dogan_holding_supply_chain_management_policy.pdf



ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Sustainability is an integral part of our vision and values. Our environmental efforts are conducted with the following objectives in mind, within Doğan Group's sustainability framework - Doğan Impact Plan:

- Supporting our company's growth and exceeding our customers' increasing expectations for more sustainable products and services.
- Improving our operational efficiency, including lowering costs and reducing the environmental footprint of our operations and supply chain.
- Expanding engagement with our stakeholders on environmental issues.

As mentioned in **Doğan Group Environmental Policy**, publicly disclosed on the corporate website, Doğan Group companies devise policies and strategies to protect and improve the environment, prevent pollution, preserve and foster biodiversity, wildlife, ecology, flora and fauna, waterways and natural resources.

Doğan Holding's environmental management policy focuses on the following five areas:

- Energy,
- Waste Management, Disposal and Recycling,
- Water Usage,
- Transport,
- Air Emissions.

Within Doğan Impact Plan, Doğan Group has a global ambition to become carbon neutral by 2030, and to recycle 100% of the water we use until 2030.

Doğan Group is committed to:

- Complying with international legal regulations approved by national public agencies, environmental laws, regulations and other obligations,
- Pursuing international best practices, including those not demanded by public authorities, so as to internalize those that could contribute to our business,
- Raising the environmental awareness of the citizens of Turkey and the citizens of other countries where our publications and broadcasts are available,
- Preferring and utilizing eco-friendly technologies,
- Developing eco-friendly products and services,
- Reusing raw materials and equipment or increasing the usage of recycled raw materials and equipment in order to save natural resources,
- Increasing energy efficiency and prioritizing renewable energies in all our operations to ensure responsible energy consumption,
- Taking action to measure and improve the environmental footprint of our Group activities,
- Improving the efficiency of the Doğan Environmental Management System on an ongoing basis, and disclosing it to the public,
- Ensuring that the environmental management systems of Group companies are in line with the accepted standards, certified and periodically audited by authorized firms,
- Reviewing the environmental policy of the Company regularly and monitoring the compliance of the Holding and Group companies with this policy,
- Communicating and developing joint projects about the environment with NGOs,

https://www.doganholding.com.tr/media/2243/dogan_group_environmental_policy_2091009.pdf



ENVIRONMENT

- Training all employees about the natural environment and encouraging them to participate in ecological activities;
- Communicating with all stakeholders regarding protection of the natural environment, administering training seminars, and expending efforts to diminish our environmental footprint and to protect biodiversity in all our areas of operation.

Doğan Group's Environmental Policy is followed by the Holding and all Group companies. Group companies participate in the determination of environmental objectives. The Early Risk Detection Committee is charged with implementing the Environmental Policy. The Early Risk Detection Committee is responsible for setting environmental objectives, establishing the environmental management system, determining performance criteria, and creating action plans. The efficiency of the environmental management system is audited by the audit departments of the Holding and Group companies, and the results are submitted for the assessment of the Audit Committee and the Board of Directors.

We closely follow current technological developments and regulations in order to ensure environmentally sustainable conditions in our administrative buildings and quickly implement the necessary projects. The Holding's head office, in use since 2011, is equipped with new-generation cooling devices in line with EU norms, and these devices use the eco-friendly gases R 410 and R 132. The headquarters building is also equipped with a state-of-the-art, eco-friendly fire-extinguishing systems, and we have reduced the weight of individual fire extinguishers by replacing them with eco and people-friendly systems that deploy FM 200 and Novac 1230 gases in compliance with EU standards. The insulation technology used in the building has led to a decline in natural gas consumption for heating and a drop in electricity consumption for cooling, resulting in a reduction in overall CO2 emissions.

Knowing that disposing organic waste has an adverse effect on climate change and causes environmental problems, we began recycling our garden waste. Thanks to our garden composting machine, the precious soil obtained from waste can be reused. Doğan Holdings' commitment to composting food waste means that all organic wastes from our buildings will be recycled and used as fertilizer.

Doğan Holding continues to make significant progress in reducing our environmental impact. Our most recent results show a 31% reduction in water usage (2019-2020) and a 9% reduction in electricity usage (2019-2020).



ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

With **Doğan Group Anti-Bribery and Anti-Corruption Policy**, publicly disclosed on the corporate website, we aim to adhere to anti-corruption and anti-bribery laws and regulations as well as to the legal regulations and ethical principles in those countries where the company operates. The Group also seeks to determine the rules and responsibilities about this issue. The policy binds all employees, The Top and Mid management, The Board of Directors and all related parties (suppliers and business partners, dealers, authorized dealers and authorized services, etc.).

We carry out our activities in a fair, transparent, and honest manner, in compliance with legal rules and code of conducts. Besides being extremely sensitive about fighting with bribery and corruption, we are against bribery and corruption and never tolerate activities involving bribery and corruption. In this respect, offering, implying, receiving, or accepting bribe is unacceptable. As an adopted principle, we discontinue our business relationship with 3rd parties who demand to work with the Doğan Group through bribery.

Our Anti-Bribery and Anti-Corruption Policy has been announced to the employees of the Doğan Group and it is continuously and easily accessible through the Doğanbiz portal of the Company. Trainings are organized in order to raise the awareness of our employees with regard to being against bribery and corruption.

In 2020, no cases of bribery or corruption have been reported in Doğan Group.

https://www.doganholding.com.tr/media/1722/20151030_dogan_holding_anti-bribery_and_anti-corruption_policy.pdf





Contact us

neslihans@doganholding.com.tr

Learn more

www.doganholding.com.tr

Stay connected



/Doğan Holding



/Doğan Holding



/Doğan Holding



/Doğan Holding



/doganholding



KNOWS
AND
CREATES
VALUE