

Otokoç Otomotiv

STAKEHOLDER ENGAGEMENT PLAN



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1. Introduction

This Stakeholder Engagement Plan provides a general framework for the stakeholder engagement process planned by Otokoç Otomotiv Tic. ve San. A.Ş. at the corporate level for all its locations and operations in Türkiye.

The Plan describes the principles on how stakeholders are identified, public consultation operations and feedback (complaint/grievance) mechanisms are designed and implemented. Such processes are structured in line with the transparency, participatory and accountability principles of the company.

Within the scope of the sustainable financing process carried out by Otokoç Otomotiv with IFC, a subsidiary of the World Bank, the present Stakeholder Engagement Plan (SEP) has been prepared in accordance with the related requirements and IFC Performance Standards (PS). The Plan has been developed to ensure transparent sharing of information on the project process and to enable meaningful stakeholder engagement.

Within this framework, Otokoç Otomotiv is committed to establish sustainable, open and participatory communication with its employees, local communities and other key stakeholders directly affected by its operations. According to the company's fields of activity, each operational unit shall act in accordance with this corporate plan and carry out processes, including the respective complaint mechanisms.

This plan shall be published as a public document and interaction shall be promoted through communication channels where stakeholders can submit their opinions, suggestions, complaints or grievances.

In case of any questions, comments or suggestions regarding this Stakeholder Engagement Plan or the Company's operations, you may use the contact details provided below:

Otokoç Otomotiv Head Office

Address: Aydınevler Mah. Saygı Cad. No: 60/1 34854 Küçükyalı / İstanbul
Phone: 0 216 587 98 00
Fax: 0 216 388 98 79
Ethics Hotline: www.koc.com.tr/ihbarbildirim
Website: <https://www.otokocotomotiv.com.tr/>

About Otokoç Otomotiv

Otokoç Otomotiv is the leading mobility company of Türkiye, founded in 1928 as the first investment of Koç Group in the automotive sector. Otokoç serves under the brands of Avis, Avis Filo, Maestro Filo Yönetimi, Budget, Otokoç Sigorta, Otokoç 2.El, Otokoç İhale and Otokoç Parça.

Otokoç Otomotiv fulfills the diverse needs of its customers with its comprehensive range of mobility services. Short-term car rental services are provided through Avis and Budget brands, operational rental (fleet rental) services through Avis Fleet brand, and end-to-end fleet management services through Maestro Fleet Management.

With its Ford, Ford Trucks, Volvo, Fiat, Alfa Romeo, Jeep and Maserati makes, the company offers a wide range of automotive solutions such as new vehicle sales, after-sales service and spare parts services, wholesale spare parts and accessories sales, second hand vehicle sales, tender systems, vehicle protection solutions, insurance and financing to its customers under a single roof.

As of today, Otokoç Otomotiv operates in Türkiye as well as in a total of **300 locations** including Greece, Hungary, Ukraine, Georgia, Azerbaijan, Kazakhstan, Northern Cyprus and Northern Iraq.

Retail

Otokoç: With the brand Otokoç, the first automotive sector investment of Koç Holding, the company carries out sales and after-sales operations of Ford, Ford Trucks, Volvo, Fiat, Alfa Romeo, Jeep and Maserati makes. It operates in a widespread service network with 51 branches in Türkiye and carries out pioneering activities that prioritize unconditional customer satisfaction.

Otokoç 2.El: It carries out its operations as a point of trust in Otokoç 2.El vehicles with innovative options such as vehicle sales, car purchase with cash on the same day, professional expertise services, widespread service network, contactless delivery, online purchase and tender system. Providing service in 39 locations across Türkiye, it aims to grow even more with the dealership system in the coming period.

Otokoç



Otokoç Sigorta: With 26 branches in 9 provinces across Turkey, it acts as the agency of leading and reliable companies in the sector, particularly in the fields of traffic and automobile insurance, health insurance, household and business insurances.

Otokoç Sigorta
Aracılık Hizmetleri A.Ş.

Otokoç Parça: It operates in the wholesale and retail sale of genuine and equivalent spare parts. In addition to the dealerships of Ford, Fiat, Magneti Marelli and Mako makes, it also sells spare parts, batteries, tires, accessories and consumables domestically and internationally under its own brand Axam. In retail sales, it supplies chain market and insurance companies along with online and offline channels.

Otokoç Parça

Vehicle Rental

Avis: The story of Avis marks the beginning of the story of car rental in Türkiye. Founded 50 years ago, this sector has come to this day by overcoming many challenges. As Avis, it provides car rental services with 79 offices in 45 provinces of Türkiye.

AVIS

Avis Filo: Offering fleet rental services with Avis difference, Avis Fleet is the leading brand in operational car rental activities with services such as professional portfolio management, fast and widespread replacement vehicle supply process, and 24/7 full support throughout Türkiye.

AVIS filo

Maestro Filo Yönetimi: is a comprehensive service offering end-to-end fleet management for owners of both company-owned and rental vehicles. Through its fleet management services, it provides maintenance, damage and breakdown processes, tire replacement and storage, insurance, and assistance services. With its telematics services, it enables real-time vehicle tracking, travel reports, driving analysis, and scoring to ensure economical and safe driving.

MAESTRO
FİLOYÖNETİMİ

Budget: Thanks to the Budget brand, it combines the power of one of the world's largest car rental brands with experience, flexibility and tailor-made solutions. As Budget, it provides services in the field of car rental with 57 offices in 33 provinces of Türkiye.

Budget

Payless Car Rental: It provides services in Greece under the Payless brand.

Payless
CAR RENTAL

2. National Legislation

The legal ground for the corporate approach to stakeholder engagement is established by several special laws and regulations, particularly the Constitution of the Republic of Türkiye. The following are the main national legislations that Otokoç Otomotiv is obliged to comply with while regulating stakeholder relations, and these regulations constitute the legal basis for the corporation to act in line with the principles of transparency, equality, participatory and accountability.

Constitution of the Republic of Türkiye

The legal framework for stakeholder engagement processes is based on the Constitution of the Republic of Türkiye. The provisions in the Constitution guarantee freedom of thought, freedom of expression, and individuals' rights to information, participate and express opinions, thereby laying the foundation for a democratic and inclusive decision-making process.

Article 10 – Equality before the Law: It states that all individuals have equal rights without discrimination as to language, race, color, sex, political opinion, philosophical belief, religion, sect or any such grounds and that the state is obliged to ensure that this equality is actualized. It also states that public authorities are obliged to observe this principle in all their actions.

Article 25 – Freedom of Thought and Opinion: It guarantees that individuals can freely express their thoughts and opinions, cannot be forced to disclose them and cannot be punished for doing so.

Article 26 – Freedom of Expression: It regulates that everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing, in pictures or through other means. This freedom can only be limited on legitimate grounds such as public order, national security and protection of the rights of others.

Article 74 – Right of Petition, right to Information and Appeal to the Ombudsperson: It defines the right of citizens to submit their requests, suggestions and complaints by applying in writing to the administration.

Law no. 4982 on the Right to Information

It defines the processes of obtaining information about the activities of public institutions. This law sets the framework for access to information in line with the principles of transparency and accountability.

Law no. 3071 on the Exercise of the Right to Petition

It regulates the right of individuals to submit written applications to the Turkish Grand National Assembly (TGNA) and administrative authorities on matters concerning themselves or the public.

Environmental Law no. 2872 and Environmental Impact Assessment (EIA) Regulation

The purpose of the Environmental Law no. 2872 is to manage and protect the environment, which is the common asset of all living things, in line with the principles of sustainable environment and sustainable development, and to assess environmental impacts thereof. The environmental impact assessment aims to act in line with the principles of preventive approach, protection of natural resources and environmental sensitivity. The EIA Regulation sets out the procedures for the public information and engagement process for investment projects.

Regulation on Assessment of Environmental Impact (Official Gazette dated 29.07.2022 and numbered 31907)

It regulates procedures and principles regarding public information and engagement in projects subject to the EIA process. As a requirement of participatory environmental management, the regulation guarantees the public's right to access timely, adequate and comprehensible information on the potential impacts of the project and its right to express opinions.

Article 9 – Public Information and Participation in the Process:

It guarantees that the public likely to be affected by the project is informed in a timely and accurate manner about the content of the project and their engagement in the project processes.

In this context:

- Public information meetings must be held in compliance with certain procedures and in accessible areas.
- The duration and method of meeting announcements are clearly defined by law.
- Engagement processes are not limited to the meeting, but also aim for a sustainable interaction throughout the project.

In addition, the Stakeholder Engagement Plan (SEP) prepared by the project owner must systematically set out the ways in which the public can access information and the engagement mechanisms.

The stakeholder engagement plan (SEP) prepared is submitted as an annex to the EIA application file. When deemed necessary, the Ministry may also ask the competent institutions/organizations to carry out additional works such as distributing informative brochures, conducting surveys, seminars, or sharing information by preparing a website related to the project during the EIA process to inform the public. In addition, if requested by the Ministry, this plan is updated during the EIA process.

Labor Law no. 4857

The Labor Law no. 4857 is the basic legislation regulating the relationship between employees and employers in Türkiye. It provides a legal framework for determining working conditions, job security, occupational health and safety, working hours, child labor and prevention of discrimination.

Article 5 – Principle of Equal Treatment: No discrimination as to language, race, gender, political opinion, philosophical belief, religion or any other similar grounds is permissible in the employment relationship. The employer is obliged to act in accordance with the principle of equality in the establishment, execution and termination of the employment contract. Any kind of direct or indirect discrimination including the gender-related pay gap is prohibited.

Article 24 – Employee's Right to Terminate Immediately for Just Cause: Employment contracts, whether for a definite or indefinite duration, may be terminated by the employee for just cause and without notice. These cases are regulated in a limited manner in the Law and take the protection of the employee as a basis.

Article 41 – Overtime Pay: Overtime work can be performed for the general benefit of the country or due to nature of the work or for the purpose of increasing production. The written consent of the employee is required for overtime work to be valid. Additional remuneration is mandatory for extra hours.

Article 42 – Compulsory Overtime Work: In case of compulsory situations (disaster, malfunction, malfunction prevention, etc.), overtime work may be performed without the consent of the employee. In this case, it is essential that the overtime work is immediate and temporary. The employer's obligation to provide the employee with an appropriate break period is reserved.

Article 71 – Working Age and Prohibition of Child Employment: Employment of children under 15 years of age is prohibited. Children who have reached 14 years of age and completed primary education may be employed in light work that does not harm their development. Child labor is only possible in special circumstances and in limited ways.

Law no. 6698 on Protection of Personal Data

The Law no. 6698 sets out the procedures and principles regarding the processing of personal data of natural persons and aims to protect fundamental rights and freedoms. As per the Law, it is mandatory to carry out the processing, storage, transfer and deletion of personal data in accordance with certain principles.

Otokoç Otomotiv regards data security as a corporate responsibility and processes personal data only within the framework of explicit consent, legal obligation or legitimate interest. All data processing activities within the company are carried out in accordance with the Personal Data Protection Policy.

Law no. 4054 on the Protection of Competition

The Law no. 4054 aims to protect and promote effective competition within free market conditions and prohibits any and all kinds of agreements, practices and associations of undertakings that may distort or restrict competition.

In line with the Competition Law Compliance Policy prepared to ensure compliance with competition law obligations, Otokoç Otomotiv pays utmost attention to protecting competition in all business processes and aims to prevent risky fields by informing its employees through regular trainings.

Turkish Criminal Law no. 5237 (Turkish Penal Code)

The Turkish Criminal Law no. 5237 is the main legal framework regulating the relationship between crime and punishment in Türkiye. In connection with the company's operations, it is of importance in terms of provisions on anti-corruption, right to privacy, information security and financial crimes.

Otokoç Otomotiv considers it a corporate obligation to ensure full compliance with the provisions of the Turkish Penal Code through its Anti-Bribery and Anti-Corruption Policy, Whistleblowing Policy and Personal Data Protection Policy put into effect in this context, as well as early detection and prevention of internal violations.

Law no. 5549 on Prevention of Laundering Proceeds of Crime

The Law no. 5549 aims to prevent the concealment of the proceeds of crime by introducing them into legitimate financial systems. The main objective of this law is to ensure transparency, accountability and efficiency in the fight against crime in the financial system.

In order to comply with this regulation, Otokoç Otomotiv implements the Policy on Prevention of Money Laundering and Financing of Terrorism and Proliferation of Weapons of Mass Destruction, and takes into account both national and international obligations by adopting a risk-based monitoring approach in all financial transactions.

Compliance and Ethical Obligations

Otokoç Otomotiv adopts as a principle not only to comply with legal regulations but also to conduct its operations within the framework of ethical values and internal control mechanisms.

In this context, the corporate values, Code of Ethics and Compliance Policies of Otokoç Otomotiv are taken as a basis in all communication, consultation and interaction processes with stakeholders and guide them accordingly.

Our Company aims to prevent unethical behavior, protect corporate reputation and mitigate legal risks through the policies and procedures listed below.

Code of Ethics: It aims to create a business culture based on equity, honesty, trust, respect and responsibility throughout the corporation. It sets out the framework of behavior that all employees and stakeholders are expected to comply with.

Compliance Policy: It systematizes internal audit, monitoring and control mechanisms to ensure compliance with legal and regulatory requirements. It manages the process of identifying and preventing compliance risks.

Anti-Bribery and Anti-Corruption Policy: It aims to prevent any and all kinds of conflicts of interest, attempts to gain illegal advantages and unethical interactions in corporate processes. It is based on the principle of zero tolerance.

Donation and Sponsorship Policy: It ensures that all donations and sponsorship activities carried out within the framework of corporate social responsibility are carried out in accordance with the principles of transparency, traceability and public interest.

Gifts and Hospitality Policy: It defines the permissions, limits and recording arrangements for gifts or hospitality that may create unethical referrals between employees and stakeholders.

Human Resources Policy: It defines respect for the fundamental rights and freedoms of employees and all stakeholders as a corporate obligation. It promotes the principles of non-discrimination, equality and dignified working conditions.

Supply Chain Compliance Policy: It oversees compliance with human rights, occupational health and safety, environmental responsibilities and ethical rules in relations with suppliers. It is based on a sustainable business partnership approach.

Social Investment Policy: It aims to support projects that add value to society and provide long-term social benefits, and to contribute to sustainable development in the regions where the company operates.

Sanctions and Export Controls Policy: It sets out control processes to prevent legal risks and reputational damage by ensuring compliance with international sanctions, embargoes and export controls.

Competition Law Compliance Policy: It has been established to ensure that the company refrains from anti-competitive practices. It assures compliance with competition rules and provides guidance for employees.

Personal Data Protection Policy: It ensures compliance with the law in the processing, storage and sharing of personal data in accordance with data protection legislation, particularly PDPL no. 6698.

Discipline Policy: It is implemented to ensure that employee behaviors comply with company rules and to ensure equality and consistency in disciplinary processes.

Whistleblowing Policy: It provides a secure, anonymous and retaliation-proof communication channel for reporting unethical behaviors, corruption or violations of regulations.

Policy on Prevention of Money Laundering and Financing of Terrorism and Proliferation of Weapons of Mass Destruction: It prevents the use of illegal resources in financial activities, identifies risky transactions in advance and ensures compliance with national/international obligations in this context.

These policies enable Otokoç Otomotiv to act in full compliance with all national and international legislation and contribute to the implementation of the principles of human rights, information security, legal responsibility and social sensitivity in a holistic framework.

International Legislation and Standards

United Nations Universal Declaration of Human Rights (1948)

The Universal Declaration of Human Rights is a universal document that guarantees the fundamental rights and freedoms of women, men and children. It outlines the general framework of economic, social, cultural, civil and political rights. The first article of the Declaration reads, "All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood." All of its articles cover the fundamental rights of human beings in every field. This declaration, together with related international conventions and protocols, forms the basis of International Human Rights Law.

The Human Rights Policy of Otokoç Otomotiv has been established in line with the universal principles included in this declaration. A fair, respectful and human dignity-based approach is adopted in the company's operations towards all stakeholders.

United Nations Guiding Principles on Business and Human Rights (UNGP, 2011)

The UNGP is the framework document adopted by the United Nations that systematizes the responsibilities of the private sector towards human rights. It consists of three basic principles: the state's obligation to protect, the company's obligation to respect and effective remedial mechanisms. Otokoç Otomotiv adopts a risk-based approach to identify, prevent and mitigate any impacts on human rights that may arise from its operations. The Ethics Hotline and Whistleblowing Mechanism established in this context enables the reporting of any concerns and violations of human rights in a

secure, accessible and transparent manner, and ensures that the company effectively handles and manages these reports. All these processes are carried out within a corporate structure in compliance with the UN Guiding Principles on Business and Human Rights.

Core Conventions of the International Labor Organization (ILO)

The core conventions adopted by the ILO regulate universal rights at work and decent working environment. These conventions, which have also been adopted by the Republic of Türkiye, set minimum standards for relations between employers and employees.

The human resources management, code of ethics and supply chain practices of Otokoç Otomotiv are structured in line with the core principles of the International Labor Organization (ILO).

The Company considers preventing discrimination in working environments, providing access to equal opportunities and maintaining constructive social dialogue with employees as part of its corporate responsibility and manages its processes accordingly.

IFC Environmental and Social Sustainability Performance Standards Requirements

Otokoç Otomotiv is committed to implementing a Stakeholder Engagement Plan in line with the IFC Performance Standards Requirements (2012). Performance Standards 1, 2 and 7 are referred to.

Performance Standard 1 emphasizes the need to identify the environmental and social impacts, risks and opportunities of operations, to ensure transparent communication and stakeholder engagement on these issues, and to effectively manage environmental and social performance throughout the course of operations. It also supports the establishment of an effective complaint mechanism to ensure that stakeholders who are adversely affected by its operations are identified early and their complaints are resolved quickly.

Performance Standard 2 aims to protect the fundamental rights of employees, ensure safe and fair working environment and establish a constructive relationship between employees and management. Treating employees fairly, establishing a transparent communication environment and creating a healthy workplace culture are critical for the sustainability of operations.

In this context, an accessible, safe and effective employee complaint mechanism is established so that employees and, where applicable, sub-employers can freely raise concerns at work.

Performance Standard 7 recognizes that Indigenous Peoples, who have different identities from mainstream society, are often the most marginalized and vulnerable groups in a society. Indigenous communities may face social, economic and legal barriers to asserting their rights on land and natural resources, and to participate in and benefit from development processes. Otokoç Otomotiv identifies in advance the Indigenous People communities in the affected area of its operations and the potential economic, social, cultural and environmental impacts on these communities. Adverse impacts are avoided as far as possible, and if this is not practicable, impacts are mitigated, remediated or compensated, taking into account the sensitivities of Indigenous Peoples. This process is carried out through Informed Consultation and Engagement of communities and, where required, concrete action plans, such as the Indigenous Peoples Plan, are prepared.



3. Stakeholder Engagement Plan Targets

Stakeholder engagement is a dynamic process with continuity. This process consists of a series of steps consisting of identifying and prioritizing stakeholders, conducting information activities, carrying out consultations that allow for mutual exchange of opinions, establishing an effective feedback and complaint mechanism, and regular information transfer to affected communities. Each step aims to build a fiduciary relationship with stakeholders. This plan has been developed to ensure that a comprehensive, consistent, effective and meaningful stakeholder engagement process is implemented in line with all legal and regulatory commitments. The engagement processes are designed to be carried out in a coordinated and accessible manner, taking into account cultural sensitivities.

The main objectives of stakeholder engagement are as follows:

4. Stakeholder Identification, Analysis And Engagement Planning

This process involves identifying and analyzing all stakeholders who are directly or indirectly affected by or may affect the company's operations, and planning appropriate communication strategies. The process further aims to ensure meaningful consultation and engagement with stakeholders, to establish an accessible complaint mechanism, and to provide a regular and transparent flow of information to stakeholders.

Otokoç Otomotiv shall manage environmental and social risks that may arise as a result of its operations in accordance with the features and interests of the Affected Communities, taking into account the potential impacts and development stage of the operations.

Where necessary, special methods and measures shall be taken to ensure the effective engagement of disadvantaged or vulnerable groups in the process. In case of projects where the engagement process is envisaged to be carried out through local community representatives, Otokoç Otomotiv shall make reasonable efforts to ensure that these representatives truly reflect the views of the community and communicate the results of the consultations to all members of the community in an accurate and transparent manner.

Exchange of Information: Clear and comprehensible information shall be provided on all issues of interest to stakeholders. This information shall include descriptions of potential risks and impacts, opportunities that may arise, methods to be followed in engagement and consultation processes, and how complaints are to be handled. The objective is to enable stakeholders to consciously engage in the process and contribute effectively to decision-making mechanisms.

Consultation: It shall carry out a meaningful consultation process with Affected Communities that may be exposed to risks and adverse impacts as part of its operations. This process shall enable communities to express their opinions on risks, potential impacts and planned measures to be taken, and shall also ensure that Otokoç Otomotiv takes this feedback into account, makes the necessary assessments and responds appropriately. The scope and method of consultation activities shall be proportionate to the level of risk, potential impacts and concerns raised by communities. An effective and inclusive consultation process shall be carried out in an approach that is transparent, voluntary, appropriate to the cultural structure of local communities, comprehensible, prioritizing the engagement of directly affected individuals, traceable and encouraging meaningful engagement. Otokoç Otomotiv shall also take into account the needs of disadvantaged or vulnerable groups and ensure their effective engagement in the consultation process. The company shall document its practices and the adequacy of the process carried out within this scope.

Informed Consultation and Engagement: When Otokoç Otomotiv has potentially significant impacts on Communities affected by its operations, a transparent and inclusive communication process shall be carried out with these communities.

In this process, any suggestions, concerns and expectations of affected Communities shall be directly listened to and included in decision-making processes on issues such as environmental and social measures to be taken, development contributions and sharing of opportunities. When conducting the consultation process, care shall be paid to ensure that the opinions of different groups within the community, male and female individuals, are taken in a balanced manner, albeit on separate platforms.

The entire process of preventing or mitigating risks and negative impacts to communities shall be transparently recorded, and communities shall be regularly informed about how feedback received has been assessed.

For activities that may affect local people, their free and prior informed consent shall be obtained, where necessary, by involving them in an informed consultation and engagement process.

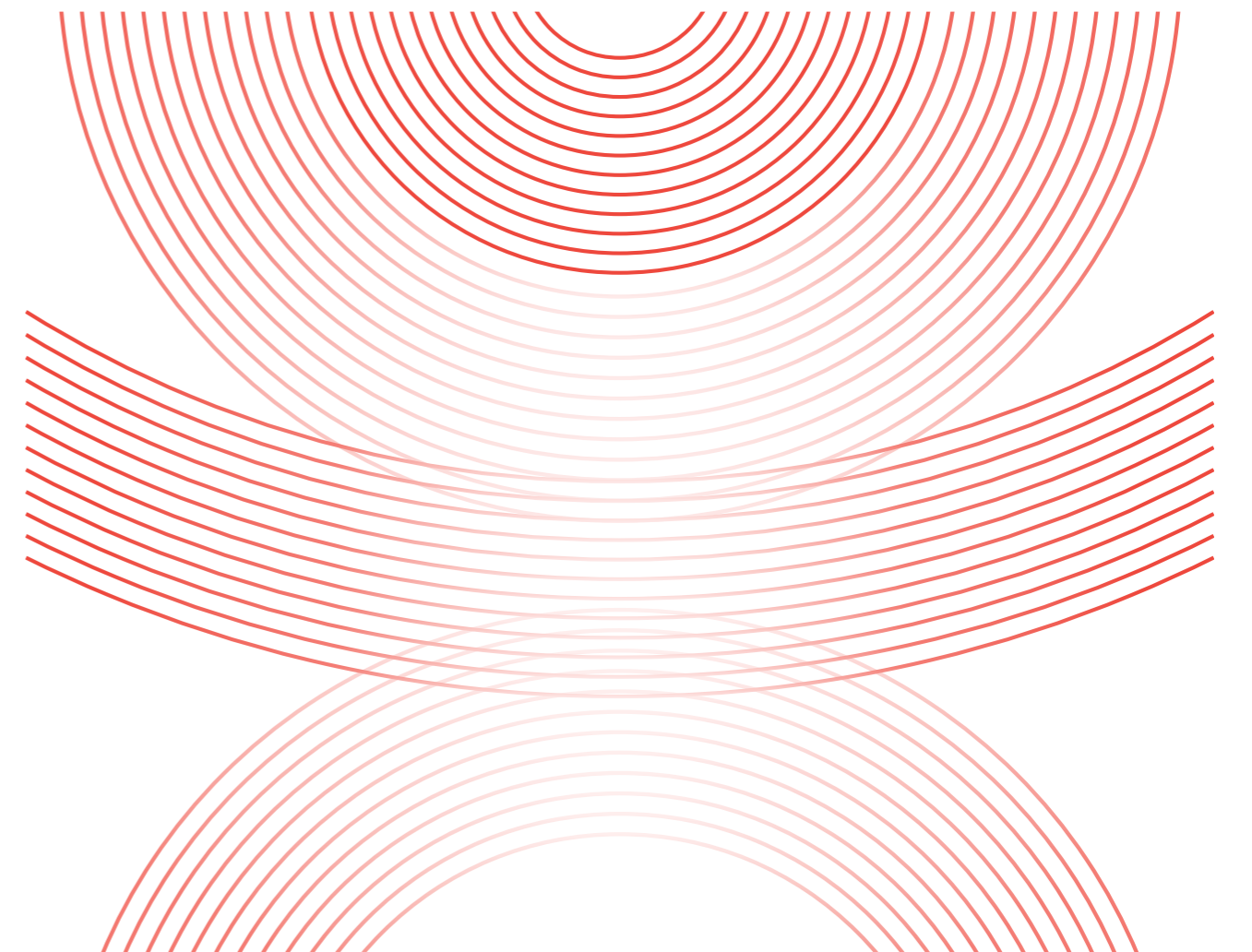
When stakeholder engagement is undertaken under the responsibility of the host government, cooperation with relevant government agencies shall be conducted to the extent permitted. Where government capacity is limited, Otokoç Otomotiv shall play an active role in planning, implementing and monitoring stakeholder engagement.

External Communication and Complaint Mechanism: Otokoç Otomotiv shall prepare and implement an external communication procedure to ensure that external communications are handled effectively and transparently. This procedure shall include systematically receiving and recording communications from external stakeholders, prioritizing and assessing the issues raised, responding

to, providing formal feedback where necessary, and following-up and documenting responses given. It shall also include mechanisms to enable necessary updates to be made in the management of communications in line with the feedback received.

Otokoç Otomotiv shall establish a complaint mechanism through which stakeholders and Communities that may be affected by its operations can raise their concerns and complaints regarding environmental and social performance. This mechanism shall be designed to be proportionate to the potential risks and adverse impacts of the operations and shall be accessible to Affected Communities in particular. Processes to ensure fair, fast and transparent handling of complaints shall be backed by a culturally sensitive, easily accessible and comprehensible structure. The party raising a concern or complaint shall face no costs or sanctions, and shall ensure that no stakeholder raising a complaint is discriminated against. The complaint mechanism shall not be an obstacle to seeking legal or administrative remedies. Otokoç Otomotiv shall inform the Affected Communities about the complaint mechanism during the stakeholder engagement process.

Continuous Reporting to Affected Communities: Otokoç Otomotiv shall periodically share the progress made regarding concerns raised through consultations and complaint mechanism as well as Action Plans prepared to address environmental and social risks or impacts concerning stakeholders and Communities affected by its operations. In case of changes or additions to its mitigation measures or actions to address the concerns of affected stakeholders, it shall provide up-to-date information. The frequency of these reports shall be in proportion to the concerns raised, but at least once a year.



5. Company Policies And Procedures

Management Systems Policies

Otokoç Otomotiv implements the following policies.



Integrated Management
Systems Policy

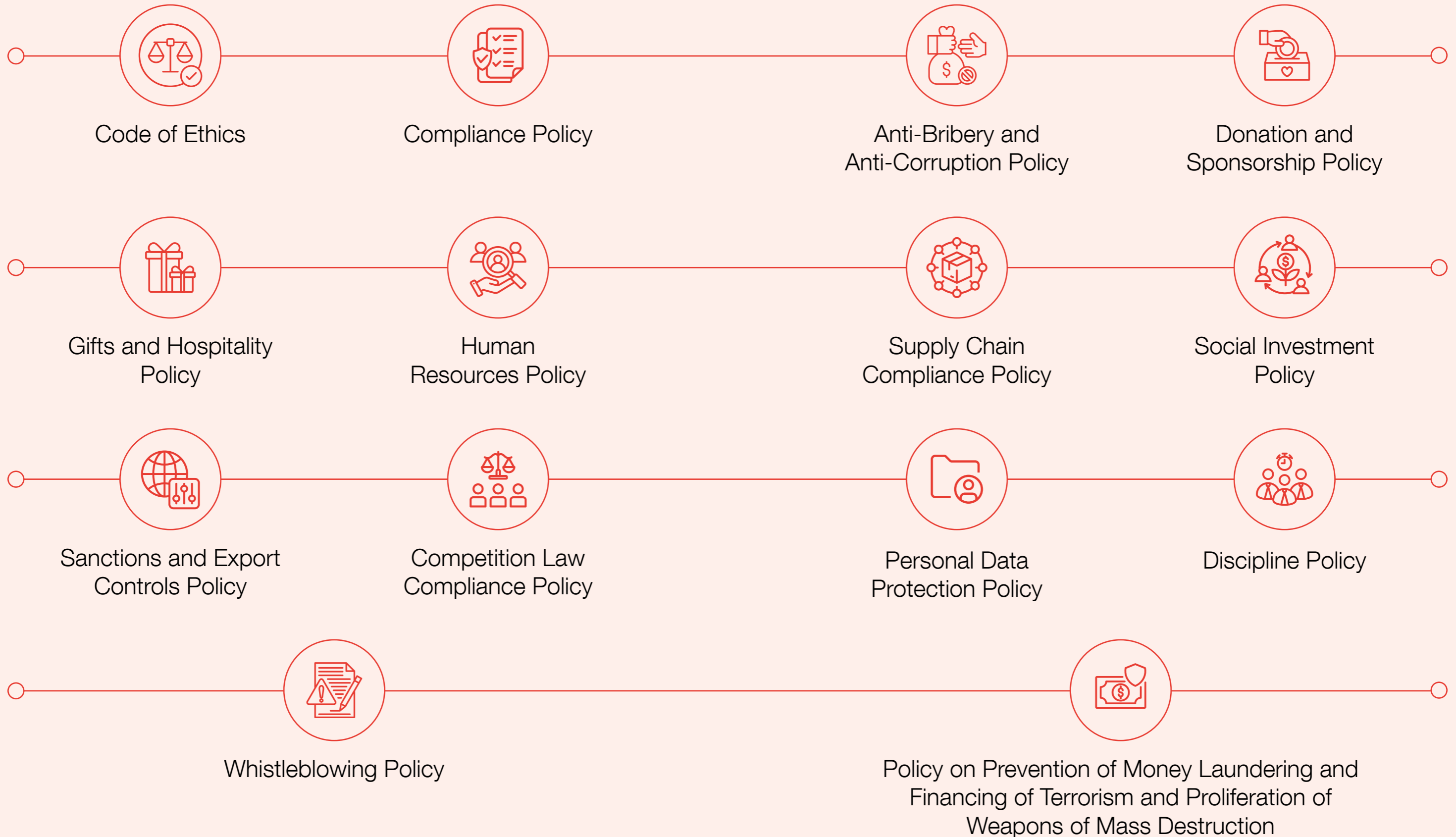


Customer Satisfaction
Management System Policy



Energy Management
System Policy

Code of Ethics and Compliance Policies



6. Otokoç Otomotiv Stakeholder Management

Otokoç Otomotiv is committed to maintaining continuous, open and inclusive communication with all its stakeholders based on transparency, accountability and participatory approach in stakeholder relations.

Stakeholder engagement processes carried out in this regard include the effective collection, assessment and integration into management decisions of feedback, suggestions and requests received from Affected Communities, employees, customers, public institutions, non-governmental organizations and any other stakeholders.

This information is considered as important inputs that guide Otokoç in fields such as shaping corporate strategies, identifying environmental and social risks and opportunities, developing and updating policies, and establishing social investment programs in line with sustainable development goals.

The outputs from the stakeholder engagement process are integrated into the environmental and social management system and regular and meaningful feedback is provided to stakeholders throughout this process.

Otokoç Otomotiv considers the stakeholder management process as a key step in a transparent, inclusive and information-based consultation and engagement process. The purpose of the stakeholder management is to identify the groups and institutions directly or indirectly affected by the project, prioritize these stakeholders, and develop an effective engagement strategy. Stakeholder identification and analysis is a continuous process. The defined stakeholder list is regularly reviewed and updated within the scope of the operations carried out, with updates in line with the complaints and requests received. As such, Otokoç Otomotiv guarantees carrying out an accessible and meaningful engagement process for everyone.

Otokoç Otomotiv performs the following in this context:

- Identifies all internal and external stakeholders that may be affected by its operations. In this analysis, a wide range of stakeholders are assessed, from local people to public authorities, employees, civil society organizations and international stakeholders.
- For the management of relations with stakeholders, communication tools, frequency of communication and impact of engagement are planned.
- Specific to Affected Communities, it works at the local level to mitigate any negative impacts, benefit from positive impacts and actively engage with the community.
- Records all complaints, grievances and requests submitted by stakeholders and provides feedback as soon as possible.
- Develops specific methods and communication channels to facilitate the engagement of particularly vulnerable or disadvantaged groups.
- Adopts culturally appropriate language and methods in all communications.
- Creates opportunities for engagement through various channels to ensure effective stakeholder engagement.
- Provides appropriate spaces for all concerned groups, particularly civil society organizations, to express their suggestions and opinions.

At Otokoç Otomotiv, stakeholders are considered in two main groups:

- External stakeholders include individuals, communities and organizations directly affected by its operations.
- Internal stakeholders include employees and relevant units that have a role or interest in the planning and implementation of operations.

Stakeholder analysis defines the responsibilities of internal stakeholders within the scope of operations and institutional functioning, while the external stakeholder analysis plans the type, frequency and content of the relationship to be established and creates a continuous and efficient communication ground.

7. Stakeholders

Employees

The safety, welfare and physical and mental health of employees are always a priority for Otokoç Otomotiv. In the sustainable growth journey of Otokoç Otomotiv, the competencies, know-how and commitment of its employees to the corporation play a decisive role in achieving its business goals.

The contribution of employees is considered one of the most fundamental building blocks in the successful implementation of corporate strategies. With this understanding, Otokoç Otomotiv resolutely maintains its responsibility to be an employer that values its employees, invests in their development and carries them into the future.

Stakeholder Engagement Approach and Operations:

A safe, healthy and supportive working environment, opportunities and experience areas to support personal and professional development, working conditions that observe business - private life balance with salary and benefits, a participatory and inspiring corporate culture that increases employee satisfaction, loyalty and commitment to the corporation, company strategy and values, respect for human rights and ethical values, diversity, equality and inclusion.

Stakeholder Communication Method and Frequency:

E-mail, phone and face-to-face meetings	Continuous
Meetings and trainings	Continuous
Digital means of communication	Continuous
Digital training programs	Continuous
Employee satisfaction surveys	Twice a year
Events organized specifically for employees	On special occasions
Performance Assessment Meetings	Annual
Training Programs	Annual
Announcements and notifications	Continuous
In-house publications	Continuous
Sustainability Report	Annual
Activity Report	Annual
In-house training programs	Annual
Code of Ethics and Compliance Policies	Continuous
Recognition, Appreciation and Reward System	Continuous
In-house Portals	Continuous

Stakeholder Prioritization Issues: Employee Satisfaction, Diversity, Equal Opportunity and Non-Discrimination, Occupational Health and Safety, Ethics and Compliance.

Customers

Otokoç Otomotiv places customer satisfaction at the center of its business model and adopts a customer-oriented approach throughout the entire value chain. Customer preferences are an important factor that directly affects the sales strategies, service infrastructure and operational planning of the company.

Customer satisfaction, loyalty and feedback are a guiding factor in the continuous improvement of the products and services offered by Otokoç Otomotiv. This feedback also plays a crucial role in enhancing the user experience, as well as providing a sustainable competitive advantage in the market.

Stakeholder Engagement Approach and Operations:

Keeping customer satisfaction at the highest level, offering a customer experience that goes beyond expectations by meeting customer demands, providing high performance, quality and reliable services.

Stakeholder Communication Method and Frequency:

Customer satisfaction surveys	Continuous
E-mail, phone and face-to-face meetings	On demand
Customer visits and meetings	On demand
Exhibitions, conferences, fairs, summits	
Website	Continuous
Social media	Continuous
Request / complaint	On demand
Code of Ethics and Compliance Policies	Continuous
Sustainability Report	Annual
Activity Report	Annual

Stakeholder Prioritization Issues: Customer Satisfaction and Safety, Corporate Governance, Customer Data Privacy, Tackling the Climate Crisis, Ethics and Compliance.

Suppliers

Suppliers contribute significantly to the continuity of operations of Otokoç Otomotiv, to the delivery of its products and services with high quality and reliability standards to customers, as well as to achieving cost advantages. Otokoç Otomotiv aims to build a sustainable future together with its business partners by managing its supply chain not only with a focus on economic benefit but also with an environmental and social responsibility perspective.

Stakeholder Engagement Approach and Operations:

Sustainability in the supply chain, developing long-term reliable collaborations.

Stakeholder Communication Method and Frequency:

E-mail, phone and face-to-face meetings	On demand
Meetings	On demand
Supplier portals	Continuous
Website	Continuous
Social media	Continuous
Request / complaint	On demand
Code of Ethics and Compliance	Continuous
Sustainability Report	Annual
Activity Report	Annual

Stakeholder Prioritization Issues: Sustainable Supply Chain, Tackling the Climate Crisis, Ethics and Compliance.

Collaborations

Otokoç Otomotiv considers the stakeholders it collaborates with as strategic stakeholders. Collaborations are shaped by relationships based on mutual development and common interest, which play a crucial role in environmental, social and economic value creation.

Collaborations refer to the partners with whom Otokoç Otomotiv engages in commercial, operational, or corporate social responsibility activities. This stakeholder group includes dealers, banks, NGOs, associations, and similar institutions, organizations, and businesses.

Stakeholder Engagement Approach and Operations:

To develop sustainable and innovative projects and collaborations.

Stakeholder Communication Method and Frequency:

E-mail, phone and face-to-face meetings	On demand
Visits and meetings	On demand
Website	Continuous
Social media	Continuous
Request / complaint	On demand
Code of Ethics and Compliance Policies	Continuous
Sustainability Report	Annual
Activity Report	Annual

Stakeholder Prioritization Issues: Tackling the Climate Crisis, Ethics and Compliance, Environment and Waste Management, Occupational Health and Safety, Corporate Social Responsibility.

Public Institutions And Legislative Bodies

Otokoç Otomotiv adopts the basic principle of conducting all its operations in a safe, responsible and fully compliant manner. Otokoç Otomotiv meticulously follows legal requirements and acts in communication with the relevant public institutions and organizations in order to closely monitor industry dynamics and regulatory developments.

In the stakeholder matrix, public institutions are represented collectively under “Public Institutions and Legislative Bodies.” However, within this group, the institutions with higher frequency of interaction and stronger regulatory authority for Otokoç Otomotiv are prioritized as key stakeholders. These include the Ministry of Environment, Urbanization and Climate Change, the Ministry of Transport and Infrastructure, the Ministry of Labor and Social Security (central and provincial directorates), the General Directorate of Security, the Revenue Administration, chambers of commerce, the Union of Chambers and Commodity Exchanges of Türkiye, and municipalities.

Stakeholder Engagement Approach and Operations:

Compliance with laws and legislation.

Stakeholder Communication Method and Frequency:

Periodic reporting, legal declarations and notifications periods	At various intervals and certain
Meetings and conferences	On demand
E-mail, phone and face-to-face meetings	On demand
Visits and meetings	On demand
Website	Continuous
Social media	Continuous
Audits	Periodic/instant
Code of Ethics and Compliance Policies	Continuous
Sustainability Report	Annual
Activity Report	Annual

Stakeholder Prioritization Issues: Corporate Governance, Tackling the Climate Crisis, Ethics and Compliance, Environment and Waste Management, Energy and Water Management, Occupational Health and Safety, Compliance with Laws and Legislations.

Affected Communities

Otokoç Otomotiv considers it its fundamental responsibility to conduct a transparent, constructive and inclusive communication process in all situations where Communities (local government representatives, civil society representatives, politicians, teachers and/or other stakeholder groups) may be affected. Communities located in the geographic regions where Otokoç Otomotiv operates and are directly affected by its activities including nearby neighborhoods, elected local representatives, and mukhtars are included in this stakeholder group.

In this regard, it ensures that affected Communities have access to accurate and timely information, safe environments to express their opinions, and meaningful engagement in decision-making processes.

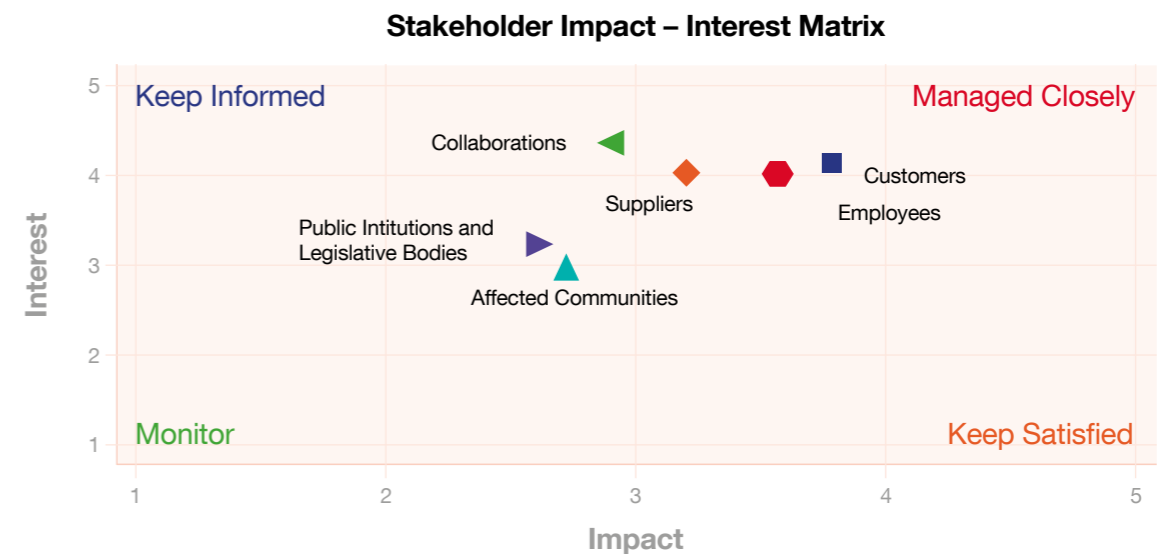
Stakeholder Engagement Approach and Operations:

Management of information, requests and complaints regarding operations.

Stakeholder Communication Method and Frequency:

E-mail, phone and face-to-face meetings	On demand
Visits and meetings	On demand
Website	Continuous
Social media	Continuous
Request / complaint	On demand
Code of Ethics and Compliance Policies	Continuous
Sustainability Report	Annual
Activity Report	Annual

Stakeholder Prioritization Issues: Corporate Governance, Ethics and Compliance, Compliance with Laws and Legislation.



Stakeholder Group	Average Impact	Average Interest	Category
Employees	4,000	3,904	Manage Closely
Customers	4,108	4,000	Manage Closely
Suppliers	3,988	3,687	Manage Closely
Public Institutions and Legislative Bodies	4,217	3,470	Keep Satisfied
Collaborations	3,217	3,024	Monitor
Affected Communities	3,072	3,072	Monitor

- Manage Closely: High impact and high interest
- Keep Informed: Low impact, high interest
- Keep Satisfied: High impact, low interest
- Monitor: Low impact and low interest

8. Complaint Mechanism

With its internal and external complaint mechanisms structured in line with the principles of transparency and accountability, Otokoç Otomotiv aims to ensure that all stakeholders can be heard in a safe, accessible and effective manner regarding not only unethical behavior and legal violations, but also all environmental, social and governance concerns.

These mechanisms are systems where stakeholders can share their opinions, complaints and suggestions on a confidential basis, are protected against retaliation and the traceability of the process is assured. Internal and external reporting processes are carried out within the framework of the Code of Ethics and Compliance Policies of Otokoç Otomotiv and are operationalized through various reporting channels, particularly the Ethics Hotline managed by Koç Holding.

8.1. External Complaint Mechanism

8.1.1. Ethics Hotline

Otokoç Otomotiv's external stakeholders – including customers, business partners, suppliers, consultants, and other third parties – may raise any concerns or complaints related to ethical matters through the Ethics Hotline, which is managed by Koç Group. These may include suspected violations of ethical principles or legal regulations, as well as issues arising from the company's activities such as social or environmental impacts, or cases of gender-based violence, discrimination and harassment. The Ethics Hotline is available 24/7 and operates both by phone and web-based systems (www.koc.com.tr/ihbarbildirim). Reports can be made anonymously, are handled within the framework of the confidentiality principle, and are considered only by authorized persons.

Pursuant to the Whistleblowing Policy (<https://www.otokocotomotiv.com.tr/assets/pdf/Koc-toplulugu-ihbar-politikasi-en.pdf>), a preliminary assessment is made immediately following such reporting and, where necessary, an independent investigation is initiated. Investigations are conducted on confidentiality basis, measures are taken against conflicts of interest and concluded in accordance with the Code of Ethics and Compliance Policies. External stakeholder complaints are recorded, managed through transparent and traceable processes, and the applicant is provided with a written response within a reasonable time period.

8.1.2. Communication Channel

Contact information of Otokoç Otomotiv is publicly available and can be found on its web pages (<https://www.otokocotomotiv.com.tr/iletisim>). All stakeholders can contact Otokoç Otomotiv through the contact details and contact form on the website, call center, social media platforms. Complaints received through these communication channels are recorded, assessed, resolved and responded to. Within the scope of the ISO 10002:2018 Customer Satisfaction Management System, Otokoç Otomotiv aims to continuously improve customer experience and keep satisfaction at the maximum level.

Customers provide feedback through various channels such as the website, call center, social media, surveys and sikayetvar.com. Reports are registered in the Voice CRM system, classified as requests or complaints and assigned to the related business unit.

The solution process is carried out in collaboration with other units when required. The call center makes the closing interview and asks about the satisfaction status. If necessary, the process is restarted. Complaints received from customers are responded to within maximum 3 hours and resolved within 1 to 4 days depending on the topic tree.

Tokens are regularly analyzed and reported, recurring issues are monitored and action plans are created accordingly. Periodic customer satisfaction surveys are conducted, results thereof are analyzed and performance indicators are monitored. In line with the insights obtained areas for improvement are identified and customer-oriented actions are developed.

8.2. Internal Complaint Mechanism

8.2.1. Ethics Hotline:

Otokoç Otomotiv employees may report any suspicions regarding unethical or unlawful practices in the workplace, as well as any concerns or complaints related to ethical issues – including potential social or environmental impacts, or cases of gender-based discrimination, harassment, and violence – directly to their line managers, the Internal Audit Department, or the Legal and Compliance Counsel, or through the Ethics Hotline. The Ethics Hotline is available 24/7 and operates both by phone and web-based systems (www.koc.com.tr/ihbarbildirim). Reports can be made anonymously, are handled within the framework of the confidentiality principle, and are considered only by authorized persons.

Pursuant to the Whistleblowing Policy (<https://www.otokocotomotiv.com.tr/assets/pdf/Koc-toplulugu-ihbar-politikasi-en.pdf>), a preliminary assessment is made immediately following such reporting and, where necessary, an independent investigation is initiated. Within the scope of reporting, no retaliation against the reporting employee shall be tolerated, unless he/she is ill-intended. Investigations are conducted on confidentiality basis, measures are taken against conflicts of interest and concluded in accordance with the Code of Ethics and Compliance Policies.

8.2.2. Employee Opinion and Reporting Hotline

An “Employee Opinion and Reporting Hotline” has been established to establish effective communication with employees and receive their requests, suggestions, complaints and feedback. Reports received through this hotline are recorded, assessed and resolved in a fair, equitable, inclusive and confidential manner. Employees can access this hotline via telephone during working hours.

Through this hotline, employees can communicate their challenges faced and suggestions for improvement. They can also share their opinions and feedback on the work environment.

Employees communicate their reports verbally by phone to the representative in charge. The representative records the report on the company intranet system and forwards it to the respective unit according to the relevant category. The respective unit receives the report through the system, carries out the solution process and closes the report when it is completed. The first response is provided within three working days at the latest. Reports can be made anonymously or named, and in the case of anonymous reporting, the representative calls back whereas in the case of named reporting, the related unit calls back.



9. Monitoring And Reporting

Regular monitoring and assessment of the stakeholder engagement process is of critical importance for the healthy progress of operations and making effective decisions at the right time.

In order to measure the efficiency of this process, interaction with stakeholders and stakeholder engagement shall be continuously monitored and publicly reported every year within the scope of the Stakeholder Engagement Plan of Otokoç Otomotiv. The Sustainability Report shall include stakeholder engagement and requests, complaints, grievances and feedback received from stakeholders.





Otokoç Otomotiv