INFORMATION DOCUMENT

# CORPORATE GOVERNANCE

#### DECLARATION OF COMPLIANCE WITH SUSTAINABILITY PRINCIPLES

Otokar closely follows the best sustainability practices, including those specified in the Capital Market Board's (CMB) Sustainability Principles Compliance Outline, and carries out activities with the aim of complying with the generally accepted best Sustainability practices. The majority of the sustainability topics Otokar manages are congruent with the Sustainability Principles Compliance Outline introduced by CMB in 2020. Otokar is already in compliance with the majority of the non-mandatory principles in the Sustainability Principles Compliance Outline imposed by the Capital Markets Board on a "comply or explain" basis. However, full compliance with all the principles has not yet been achieved due to the challenges in implementing some of these principles, uncertainties in the overall national and international landscape, certain principles not fully aligning with the current structure of the company, and the fact that some compliance principles will be identified based on the findings of ongoing studies. Once these ongoing studies within the scope of internationally accepted practices are completed, Otokar aims to align with the principles that yet to be complied with.

The practices that are congruent with the principles specified in CMB's Sustainability Principles Compliance Outline are disclosed in various sections of the Annual Reports, corporate website, and Sustainability Reports. The explanations provided in the Declaration Table also include references to the information disclosed in the latest Sustainability Reports. Otokar releases its Sustainability Reports, which provide the most comprehensive statements on the management of social, environmental and governance risks, at the beginning of the third quarter every year. Otokar monitors the impact on environmental and social risk management due to lack of full compliance with the non-mandatory principles and considers such impact in its sustainability-related work.

Regarding principle A1.2, although there are targets monitored with scorecards in many areas within the scope of ESG policies, starting with environment and occupational safety, work is ongoing to set long-term targets. Once the target setting system is in place, the short- and long-term targets will be disclosed to the public.

Regarding principle A4.1, Otokar works with an independent third party for verification purposes to further improve the reliability of the consolidated financial statements disclosed to the public. A process is ongoing to publicly disclose the verification results of other environmental and social indicators in the years to come.

Regarding principle B9, the activities carried out in 2023 included carbon footprint calculations for Scope 1 and Scope 2, target modeling, and target feasibility studies along with calculations for Scope 3 emissions. With 2021 taken as base year, Scope 1-2-3 emissions have been assured by BSI according to the ISO14064-1 standard. The Scope 1-2-3 emissions for 2022 have been accredited by BVQI (Bureau Veritas). Calculations were also made with Carbon Trust in accordance with the GHG standard. Otokar started to work on setting targets in line with the Science Based Targets initiative (SBTi) in 2022. Pending SBTi's revision of the automotive industry guidelines, Otokar plans to apply for approval of its target commitments in 2024 without waiting for the publication of the guidelines.

Regarding principle B12, although there are targets tracked with scorecards in many areas within the scope of ESG policies, starting with environment and occupational safety, work is ongoing to set long-term targets. Once the target setting system is in place, the short- and long-term targets will be disclosed to the public.

Regarding principle B14, even though the environmental performance and improvement efforts, including greenhouse gas emissions, are among the supplier selection criteria and considered in the process, the specific actions taken in these areas are not disclosed to the public due to the nature and dynamics of the suppliers' respective industries.

Regarding principle B15, although the company discloses the administrative and investment costs of environmental management activities, the returns on the efficiency-focused activities are not declared.

Regarding principle B23, the company is considering different tools to employ for transitioning to a low-carbon economy, and those evaluated as suitable will be implemented as part of the strategy determined for this purpose.

Regarding principle B24, the company is considering different tools to employ for transitioning to a low-carbon economy, and those evaluated as suitable will be implemented as part of the strategy determined for this purpose.

Regarding principle B25, the annual Sustainability Reports are the primary channel for transparent disclosure of environmental performance. The corporate website and the Annual Report also contain the environmental indicators.

The Sustainability Principles Compliance Report, which was prepared according to the formats specified in the CMB's decision no. 34/977 dated 23.06.2022 and approved by the Otokar Board of Directors, is included in the appendix of the Annual Report (pages 85-91), and the relevant documents can be accessed in Otokar's page on the Public Disclosure Platform. https://www.kap.org.tr/tr/ sirket-bilgileri/ozet/1046-otokar-otomotiv-ve-savunma-sanayi-a-s

			COMPLIAN	NCE STATUS			
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY
	A. General Principles						
	A1. Strategy, Policy and Goals			1		The Board of Directors is the	
A1.1	The Board of Directors should determine ESG-priority issues, risks and opportunities, and form ESG policies in accordance with them. For the sake of effective implementation of the aforesaid policies, internal directives, work procedures, etc. may be prepared for the corporation. For these policies, a decision of the Board of Directors should be taken and made public.	X				governing body responsible for identifying the risks and determining strategic direction in social, economic and environmental issues within the scope of sustainability, which lies at the core of Otokar's activities. The General Manager, who is also a Board member, ensures that sustainability-focused activities are carried out in compliance with corporate policies and applicable regulations. Otokar Sustainability Working Group the social, economic and environmental impact resulting from those activities. The Sustainability Working Group reports to the General Manager.	Annual Report Sustainability Section (pp. 52-53) Sustainability Report (pp. 12-13) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83 b6c51000aec1/otokar-sr-tr
	Should determine a Corporation Strategy in compliance with ESG policies, risks and opportunities	х				Otokar's ESG policies are publicly available on the corporate website.	www.otokar.com.tr/surdurulebilirlik
A1.2	Should determine and publicly disclose its short and long-term goals in line with its ESG policies.		×			Although there are targets tracked with scorecards in many areas within the scope of ESG policies, starting with environment and occupational safety, work is ongoing to set long-term targets. Once the target setting system is in place, the short- and long-term targets will be disclosed to the public	Annual Report Declaration of Compliance with Sustainability Principles Section (p. 86)
	A2. Implementation / Monitoring			1 1			1
A2.1	Should appoint and publicly disclose its committees/units in charge of implementation of ESG policies.	Х				The Sustainability Working Group reports its activities directly to the General Manager, who is also a Board member, and provides information to the Board of Directors through the General Manager.	Annual Report Sustainability Section (p. 52)
	Committees/units in charge, should report the activities carried out under the policies to the Board of Directors at least once a year and in any case, within the maximum periods of time stipulated for disclosure of annual reports in the regulations of the Board pertaining thereto.	Х				The Board of Directors is kept up to date about the efforts to comply with the Sustainability Principles through the Corporate Governance Committee.	Annual Report Sustainability Section (pp. 52-54) Sustainability Report (p. 9)
42.2	Should formulate and publicly disclose the implementation and action plans in line with the short and long-term goals determined as above.	x				The objective of Otokar Sustainability Model is to draw up a roadmap that respects the environment, people and the future to strengthen the company's business strategy in the automotive and defense industries as an organization that acts with environmental, social, and governance responsibility and values stakeholder engagement. Otokar Sustainability Model aims to move forward with a holistic and inclusive approach.	Annual Report Sustainability Section (pp. 52-54) Sustainability Report https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83 b6c51000aec1/otokar-sr-tr
A2.3	Should determine ESG Key Performance Indicators (KPIs) and declare them comparatively on an annual basis.	Х				ESG KPIs and their evolution over the years are published in the Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (p. 53) Sustainability Report https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83 b6c51000aec1/otokar-sr-tr
A2.4	Should declare innovation activities aimed to improve the sustainability performance in relation with business processes or products and services.	Х				Information on the alternative fuel vehicles with reduced environmental impact and the improvement efforts in this area is provided in the Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (pp. 56-57) Sustainability Report https://www.otokar.com.tr/ getmedia/03132b39-432t-4a75-8a83 b6c51000aec1/otokar-sr-tr

			COMPLIA	NCE STATUS			
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY
	A3. Reporting					1	
A3.1	Should report and publicly disclose its sustainability performance, goals and actions at least once a year. Should provide information about its sustainability activities within its annual report.	x				Otokar discloses information regarding the activities categorized under the environmental, social and corporate governance topics, performance results and related targets to its stakeholders. Information on Otokar's sustainability efforts is communicated through the sustainability reports as well as the annual reports and the corporate website. Starting with Otokar employees, all stakeholders are provided with information on the company's environmental, social and governance policies and practices.	Annual Report Sustainability Section (pp. 52-59)
A3.2	It should provide information as to with which of the United Nations (UN) 2030 Sustainability Development Goals its activities are related.	Х				Otokar publicly discloses its activities in areas identified as material sustainability issues through annual and sustainability reports and provides information about how the relevant KPIs are connected to different SDGs.	Annual Report Sustainability Section (p. 53) Sustainability Report (p. 13) https://www.otokar.com.tr/ getmedia/03132b39-432f- 4a75-8a83-b6c51000aec1/ otokar-sr-tr
A3.3	It should disclose information about lawsuits filed and/ or completed against it in environmental, social and corporate governance issues.	Х				All materially significant lawsuits filed against the Company and their financial consequences are disclosed to the public in the Legal Disclosures and Consolidated Financial Statements sections of the Annual Reports.	Annual Report Legal Disclosures Section Consolidated Financial Statements (p. 71)
	A4. Verification			1 1		1	Ĭ
A4.1	If verified by independent third parties (independent sustainability assurance providers), it should disclose its sustainability performance measures, and should endeavor to increase said verification actions.			x		Otokar works with an independent third party for verification purposes to further improve the reliability of the consolidated financial statements disclosed to the public. A process is ongoing to publicly disclose the verification results of other environmental and social indicators in the years to come.	Annual Report Declaration of Compliance with Sustainability Principles Section (pp. 86)
	B. Environmental Principles			· · ·		1	
В1	Should declare its policies and practices, action plans, and environmental management systems (known as ISO 14001 standard) and programs.	x				Otokar's Environmental Policy is the reference document regarding the management of environmental issues. With the Environmental Policy, Otokar states its commitment to environmental protection, efficient use of natural resources, compliance with applicable regulations, carrying out improvement work to reduce environmental impact, and establishing systems and processes for environmental control. Otokar operations are certified according to the ISO 14001 Environmental Management System.	Annual Report Sustainability Section (p. 55) Sustainability Report (p. 36) https://www.otokar.com.tr/ getmedia/03132b39-432f- 4a75-8a83-b6c51000aec1/ otokar-sr-tr
B2	Should disclose limitations to the environmental report that will be prepared under the Sustainability Principles, reporting period, reporting date, data collection process and restrictions in reporting conditions.	Х				Information on the environmental reporting scope, period and limitations is provided in the Sustainability Reports.	Information on the environmental reporting scope, period and limitations is provided in the Sustainability Reports.
B3	Provided in A2.1.						
B4	Should disclose the incentives it offers for management of environmental issues, including the achievement of goals.	x				Environmental goals are included in the score cards of company managers and employees, and environmental performance, monitored with a scorecard system, is reported to the General Manager and the Board of Directors. Environmental performance results are communicated to the stakeholders through reports studies and shared with the employees via internal communication channels. Environment-related topics are monitored through 22 key performance indicators (KPIs). In determining these indicators, GRI standards, environmental issues, industry norms and requirements, and Koç Group's material environmental aspects are considered. The annual Sustainability Reports are the primary channel for transparent disclosure of environmental performance. Environmental KPIs are also provided on the corporate website and in Annual Reports.	Annual Report Sustainability Section (p. 55) Sustainability Report (pp. 43-52) https://www.otokar.com.tr/ getmedia/03132b39-432f- 4a75-8a83-b6c51000aec1/ otokar-sr-tr

			COMPLIAN	ICE STATUS			
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY
B5	Should disclose how environmental issues are integrated into business objectives and strategies.	x				Otokar's material sustainability aspects are determined at workshops with the participation of Working Group members and senior management. The identified material aspects are reviewed by external experts every year and updated as needed. The objective of Otokar Sustainability Model, which is defined during these activities, is to draw up a roadmap that respects the environment, people and the future to strengthen the company's business strategy in the automotive and defense industries as an organization that acts with environmental, social, and governance responsibility and values stakeholder engagement. Otokar Sustainability Model aims to move forward with a holistic and inclusive approach.	Annual Report Sustainability Section (pp. (p. 53) Sustainability Report (p. 13) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83- b6c51000aec1/otokar-sr-tr
B6	Provided in A2.4.		1	11			1
B7	Should disclose how it manages environmental issues and integrates suppliers and customers into its strategies, not only in terms of direct operations, but also along the corporation value chain.	x				Otokar expects its suppliers and business partners to adopt the same environmental management approach. Accordingly, Otokar aims to spread the environmental management approach across its entire value chain beyond its own operations. Therefore, Otokar includes compliance with environmental standards and environmental impact management criteria in the supplier selection process. The environmental performance of suppliers is also monitored through regular inspections.	Annual Report Sustainability Section (p. 55) Sustainability Report (p. 20) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83- b6c51000aec1/otokar-sr-tr
B8	Should disclose whether it is included in the (sectoral, regional, national and international) policy formulating processes on environmental issues or not, as well as associations it is a member of, its environmental cooperation initiatives entered into with related institutions and non-governmental organizations, and its duties and functions, if any, assumed thereon, and the activities supported by it.	X				Environment is an area where Otokar aims to create more positive impact through collaborations and joint efforts. Accordingly, Otokar partners with different stakeholder groups and NGOs. Otokar attends the monthly meetings of the Koç Group Environmental Committee as a member, contributing to Group companies by sharing its best practices. Otokar also takes an active role in the Environmental Working Groups of OSD and TÜSIAD. Furthermore, ISO and TÜSIAD provide platforms for Otokar to engage with businesses in proximity. Such engagements facilitate discussions and collaborations regarding changes in legislation, EU compliance directives, local sanctions, and investments. These collaborations are disclosed to the public through Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (p. 55) Sustainability Report (p. 14 member associations) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83- b6c51000aec1/otokar-sr-tr
B9	Should periodically report in a comparable manner, information about environmental effects in the light of environmental indicators [Greenhouse gas emissions [Scope-1 (Direct), Scope-2 (Energy indirect)], air quality, energy management, water and waste water management, waste management, biodiversity effects].			x		The activities carried out in 2023 included carbon footprint calculations for Scope 1 and Scope 2, target modeling, and target feasibility studies along with calculations for Scope 3 emissions. With 2021 taken as base year, Scope 1-2-3 emissions have been assured by BSI according to the ISO14064-1 standard. The Scope 1-2-3 emissions for 2022 have been accredited by BVQI (Bureau Veritas). Calculations were also made with Carbon Trust in accordance with the GHG standard. Otokar started to work on setting targets in line with the Science Based Targets inlitiative (SBTi) in 2022. Pending SBT's revision of the automotive industry guidelines, Otokar plans to apply for approval of its target commitments in 2024 without waiting for the publication of the guidelines	Annual Report Sustainability Section (p. 55) Sustainability Report (pp. 3-35-38) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83- b6c51000aec1/otokar-sr-tr
B10	Should disclose details in relation to standards, protocols, methodologies and base year employed for collection and calculation of its data.	Х				In ESG data reporting, the GRI Standards are taken as basis.	Annual Report Sustainability Section (p. 54) Sustainability Report (pp. 1,50) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75-8a83- b6c51000aec1/otokar-sr-tr

		COMPLIANCE STATUS						
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY	
B11	Should declare the status of environmental indicators for the reporting year in comparison with past years (increase or decrease).	x				Environment-related topics are monitored through 22 key performance indicators (KPIs). In determining these indicators, GRI standards, environmental issues, industry norms and requirements, and Koç Group's material environmental aspects are considered. The annual Sustainability Reports are the primary channel for transparent disclosure of environmental performance. Environmental KPIs are also provided on the corporate website and in Annual Reports. Disclosing five-year historical data regarding environmental KPIs provides an opportunity to make retrospective comparisons.	Annual Report Sustainability Section (p. 55) Sustainability Report (pp. 37-38-43) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B12	Should determine and disclose short and long-term goals for reduction of its environmental impact. If an improvement is detected in the reporting year over the previously determined goals, it should provide information thereabout.		x			Although there are targets monitored with scorecards in many areas within the scope of ESG policies, starting with environment and occupational safety, work is ongoing to set long-term targets. Once the target setting system is in place, the short- and long-term targets will be disclosed to the public	Annual Report Declaration of Compliance with Sustainability Principles Section (pp. 86)	
B13	Should disclose its strategy and actions for fight against climate crisis.	x				Otokar's efforts to combat climate change are carried out within the framework of the Environmental Policy, Energy Policy, R&D Strategy, Koç Group's Climate Change Strategy, and Koç Group Climate Change Management. At Otokar, the Board of Directors determines the climate change strategies. Otokar manages climate change with an approach focused on considering risks and seizing opportunities. Accordingly, a climate change focused risk analysis study was conducted out within the scope of Task Force on Climate-related Financial Disclosures (TFCD). Sustainable products, services, and strategies that facilitate the shift to a low carbon economy were considered on the basis of risks and opportunities. The core strategy that Otokar follows to combat climate change involves limiting the impact of its products and production processes on climate. As part of these efforts, Otokar monitors the energy consumption in its production processes and the greenhouse gas emissions released. The company has also implemented a number of efficiency projects to reduce energy consumption and emissions.	Annual Report Sustainability Section (p. 56) Sustainability Report (p. 35) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
	Should disclose its programs or procedures aiming to prevent or minimize the potential negative effects of its products and/or services.	х				Information on the alternative fuel vehicles with reduced environmental impact and the improvement efforts in this area is provided in the Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (p. 57) Sustainability Report (p. 23) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B14	Should also declare the actions of third parties aiming to reduce greenhouse gas emissions.			x		Even though the environmental performance and improvement efforts, including greenhouse gas emissions, are among the supplier selection criteria and considered in the process, the specific actions taken in these areas are not disclosed to the public due to the nature and dynamics of the suppliers' respective industries	Annual Report Sustainability Section (pp. 55-56) Sustainability Report (p. 20) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B15	Should declare the total number of actions taken, projects implemented and initiatives entered into for reduction of its environmental impact, as well as their environmental benefits and cost savings.		x			Although the company discloses the administrative and investment costs of environmental management activities, the returns on the efficiency-focused activities are not declared.	Annual Report Declaration of Compliance with Sustainability Principles Section (p. 86)	
B16	Should report total energy consumption data (with the exception of raw materials), and disclose its energy consumptions as Scope-1 and Scope-2.	х					Annual Report Sustainability Section (p. 56-57) Sustainability Report (pp. 43-51) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B17	Should provide information about electricity, heat, steam and cooling generated and consumed in the reporting year.	х					Annual Report Sustainability Section (p. 56-57) Sustainability Report (p. 43) https://www.otokar.com.tr/ getmedia/03132b39-432F-4a75- 8a83-b6c51000aec1/otokar.sr-tr	
B18	Should carry out and disclose works on increasing the use of renewable energy sources, and transition to zero or low carbon electricity.	х					Annual Report Sustainability Section (p. 56-57) Sustainability Report (pp. 3-38-43) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B19	Should conduct energy efficiency projects, and disclose the resulting reduction in energy consumption and emission due to its projects.	х					Annual Report Sustainability Section (p. 56-57) Sustainability Report (p. 43) https://www.otokar.com.tr/ getmedia/03132b39-432t-4a75- 8a83-b6c51000aec1/otokar-sr-tr	

		COMPLIANCE STATUS						
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY	
B20	Should conduct energy efficiency projects, and disclose the resulting reduction in energy consumption and emission due to its projects.	х					Annual Report Sustainability Section (p. 56-57) Sustainability Report (p. 38) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B21	Should report quantities, sources and procedures of water extracted from underground or ground waters, used, recycled and discharged (Total water extraction on source basis, water sources affected from water extraction, percentage and total volume of recycled and reused water, etc.).	Х					Annual Report Sustainability Section (pp. 56-57) Sustainability Report (pp. 3-39-43) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
B22	Should disclose whether its operations or activities are included in any carbon pricing system or not (Emission Trade System, Cap & Trade or Carbon Tax).	Х				Since the regulatory processes regarding these issues are ongoing with the relevant public institutions in Turkey, Otokar is not part of any carbon pricing system yet. The company is considering different tools to employ for transitioning to a low-carbon economy, and those evaluated as suitable will be implemented as part of the strategy determined for this purpose	Annual Report Declaration of Compliance with Sustainability Principles Section (p. 86)	
B23	Should disclose its carbon credit data accumulated or bought in the reporting period.		х			The company is considering different tools to employ for transitioning to a low-carbon economy, and those evaluated as suitable will be implemented as part of the strategy determined for this purpose	Annual Report Declaration of Compliance with Sustainability Principles Section (p. 86)	
B24	If carbon pricing is applied in the corporation, it should disclose details relating thereto.		x			The company is considering different tools to employ for transitioning to a low-carbon economy, and those evaluated as suitable will be implemented as part of the strategy determined for this purpose	Annual Report Declaration of Compliance with Sustainability Principles Section (p. 86)	
B25	Should disclose all mandatory and voluntary platforms where its environmental data are disclosed.	х				The annual Sustainability Reports are the primary channel for transparent disclosure of environmental performance. Environmental KPIs are also provided on the corporate website and in Annual Reports.	Annual Report Sustainability Section (p. 54) Sustainability Report https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
	C. Social Principles							
_	C1. Human Rights and Employe	e Rights						
C1.1	Should establish a Corporate Human Rights and Employee Rights Policy covering its commitment of full compliance with the Universal Declaration of Human Rights, ILO Conventions ratified by Türkiye, and legal framework and legislation regulating human rights and labor issues in Turkey. Should disclose the aforesaid policy and the roles played and responsibilities assumed in the implementation of the policy.	х				These issues are disclosed in Otokar Human Rights Policy.	www.otokar.com.tr/etik-ilkeler- ve-uyum-politikalari/etik-ilkeler- ve-uyum-politikalari	
C1.2	Should provide equal opportunities in recruitment processes. Includes fair labor, improvement of working standards, employment of women and social inclusion issues (such as non- discrimination towards women, men, religious beliefs, language, race, ethnical origin, age, disablement, refugees, etc.) in its policies by also considering the supply and value chain effects.	х				These issues are disclosed in Otokar Human Rights Policy.	https://www.otokar.com. tr/ethical-principles-and- compliance-policies/ethical- principles-and-compliance- policies	
C1.3	Should disclose measures taken along the value chain for the sake of supervision and protection of rights/equal opportunities for minorities or certain population segments vulnerable to particular economic, environmental and social factors (low-income segments, women, etc.).	Х				Otokar Code of Ethics is based on and aligned with Koç Holding Code of Ethics and Implementation Principles, and binding on all Otokar employees, suppliers and partners. Similarly, UN Global Compact, to which Koç Holding is a party on behalf of all Group companies, is binding on Otokar's entire value chain. Therefore, Otokar strives to spread the ethical principles. These issues are also disclosed in Otokar Supply Chain Compliance Policy.	Annual Report Sustainability Section (p. 58) Sustainability Report (pp. 11-20) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr	
C1.4	Should report developments relating to applications aiming to prevent and correct discrimination, inequality, breaches of human rights and forced labor, and disclose its regulations and measures aiming to prevent employment of child labor.	Х				These issues are also disclosed in the Human Rights Policy and Otokar Supply Chain Compliance Policy.	Annual Report Sustainability Section (p. 57) Sustainability Report (p. 20) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aect/otokar-sr-tr https://www.otokar.com.tr/elik- ilkeler-ve-uyum-politikalari/etik- ilkeler-ve-uyum-politikalari	

		COMPLIANCE STATUS					
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELA- TED INFORMATION IS DISCLO- SED PUBLICLY
	Should disclose its policies regarding investments in employees (training and development policies), compensations, fringe benefits, unionization rights, work/life balance solutions and talent management.	х				These issues are also disclosed in Otokar Code of Ethics and Human Rights Policy and available in the human resources tab on the website.	www.otokar.com.tr/surdurulebilirlik/ www.otokar.com.tr/stik-ilkeler-ve- uyum-politikalari/stik-ilkeler-ve- uyum-politikalari www.otokar.com.tr/insan- kaynaklari-kariyer/
C1.5	Should determine dispute resolution processes through the establishment of mechanisms for resolution of employee complaints and disputes, and determine its dispute resolution processes.	x				These issues are addressed in the company's Whistleblowing Policy, Otokar Code of Ethics, and Human Rights Policy.	www.otokar.com.tr/surdurulebilirlik/ www.otokar.com.tr/stik-ilkeler-ve- uyum-politikalari/etik-ilkeler-ve- uyum-politikalari
	Regularly declares its activities aimed at employee satisfaction.	х				Otokar believes that employees should pursue work-life balance and promotes a work environment where this can be possible through a number of practices. Accordingly, the company organizes various events and activities to support the social life of the employees and strengthen interpersonal communication. For this purpose, employee clubs also host various events that the employees may attend with their families.	Annual Report Human Resources Section (pp. 57-61) Sustainability Report (pp. 28-29) https://www.otokar.com.tr/etik- ilkeler-ve-uyum-politikalari/etik- ilkeler-ve-uyum-politikalari
C1.6	Should formulate and disclose its occupational health and safety policies.	×				Otokar aims to protect the health and safety of its employees through maximum measures and practices. The occupational health and safety (OHS) activities are carried out in accordance with the OHSAS 18001 Standard and Otokar OHS Policy, which is disclosed to the employees and other stakeholders through various communication channels.	https://www.otokar.com.tr/ surdurulebilirlik/is-sagligi-ve- guvenligi-politikasi
	Should disclose actions and measures taken for protection of health and against occupational accidents, and occupational accident statistics.	х				OHS data is disclosed under the relevant heading on the "Sustainability" page of the Annual Report and in the Sustainability Report.	Annual Report Sustainability Section (pp. 59-61) Sustainability Report (p. 33) https://www.otokar.com.tr/ getmedia/03132b39-432t-4a75- 8a83-b6c51000aec1/otokar-sr-tr
C1.7	Should formulate and disclose to public its personal data protection and data security policies.	Х				Protection of personal data is another topic that Otokar manages diligently. Otokar Personal Data Protection Policy provides an overview of the principles that the company adopts for processing personal data. Through this policy, Otokar informs the personal data subjects transparently. Processes regarding the protection of the employees' personal data are managed according to the Personal Data Protection and Processing Policy for Employees, which is published on the corporate website.	www.otokar.com.tr/etik-ilkeler-ve- uyum-politikalari/etik-ilkeler-ve- uyum-politikalari
C1.8	Should formulate and disclose its ethics policy.	х				Otokar Code of Ethics is published on the corporate website.	www.otokar.com.tr/etik-ilkeler-ve- uyum-politikalari/etik-ilkeler-ve- uyum-politikalari
C1.9	Should disclose initiatives focused on social investment, social responsibility, financial inclusion and access to finance.	x				Otokar recognizes that its operations impact its stakeholders, the environment and society as a whole, and takes responsibility for sustainable development. The Social Investment Policy demonstrates Otokar's commitment to contributing to the welfare of its communities and the sustainable development of the environment. The relevant policies are published on the corporate website	https://www.otokar.com.tr/ getmedia/56472490-c34a- 4aa5-8832-24a9d3c7bee0/ otokar_toplumsal-yatirim- politikasi-28092021
C1.10	Should organize information meetings and training programs for employees with respect to ESG policies and applications.	x				Employees receive training on legal compliance, OHS and environmental policies and practices within the scope of ESG topics.	Annual Report Sustainability Section (pp. 59-60) https://www.otokar.com.tr/ getmedia/99994f0b-5b18-4709- a056-57c137972b5a/ofr-2022- tr-final Sustainability Report (p. 11)
	C2. Stakeholders, International	Standard	ls and Initia	itives			
C2.1	Should formulate and disclose its customer satisfaction policy dealing with management and resolution of customer complaints	Х				Otokar aims to establish long-term relations based on mutual trust with its customers while ensuring their unconditional satisfaction. Customer satisfaction is managed within the framework of Otokar Customer Satisfaction Policy and Otokar Quality Policy. Furthermore, Otokar has obtained ISO 10002 Customer Satisfaction Management System Standard and ISO 10001 Quality Management-Customer Satisfaction certifications for quality assurance of customer satisfaction. Product and service responsibility is a key component of customer satisfaction. For this purpose, Otokar continuously works to enhance the safety of its products and keeps the customers informed about the latest developments while considering social, environmental and economic impact across its production and service operations.	Annual Report Sustainability Section (p. 59) Sustainability Report (p. 26) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aecf.tokokar-sr-tr https://www.otokar.com. tr/surdurulebilirlik/musteri- memnuniyeti-politikasi

			COMPLIAN	ICE STATUS			
		YES	NO	PARTIAL	N/A	EXPLANATION	REPORT/LINK WHERE RELATED INFORMATION IS DISCLOSED PUBLICLY
C2.2	Should handle stakeholder communications continuously and transparently, and disclose with which stakeholders, for which purposes, on which issues and in which frequency it communicates.	X				Otokar follows applicable laws and regulations and capital markets legislation in shareholder relations. Information about the company is disclosed to interested parties at the annual ordinary General Assembly Meetings and through Annual Reports, Sustainability Reports, annual and quarterly Earnings Releases, periodic analyses and information documents, corporate website, press releases, material event disclosures, meetings and interviews. In all its operations, Otokar aims to create value for all its stakeholders. Therefore, it seeks to understand stakeholder expectations and develop the right responses as key part of the value creation process. Accordingly, Otokar engages in active communication with all relevant stakeholder groups. The method and frequency of communication is shaped according to stakeholder requirements and expectations. Otokar supports the activities of NGOs and platforms by becoming a member and taking responsibility in such organizations' management bodies.	Sustainability Report (p. 14) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr
C2.3	Should disclose international reporting standards it has adopted.	х				In sustainability reporting, GRI Standards are taken as basis.	Annual Report Sustainability Section (p. 54) Sustainability Report (pp. 1-50) https://www.otokar.com.tr/ getmedia/03132b39-432f-4475- 8a83-b6c51000aec1/otokar-sr-tr
C2.4	Should disclose the international organizations or principles it has signed or enrolled in and the international principles it has adopted.	х				Otokar attends the monthly meetings of the Koç Group Environmental Committee as a member, contributing to Group companies by sharing its best practices. Otokar also takes an active role in the Environmental Working Groups of OSD and TÜSIAD.	Annual Report Sustainability Section (p. 55) Sustainability Report (p. 36) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr
C2.5	Should concretely endeavor to be included in the Borsa Istanbul Sustainability Index and international sustainability indices.	x				Otokar aims to create long-term value by combining economic, environmental and social factors with corporate governance principles. Since 2014, Otokar has been included in the BIST Sustainability Index, whose constituents are listed companies with the highest corporate sustainability performance, in recognition of its sustainability performance, in Through the Sustainability Index, Otokar discloses information on its environmental, social and corporate governance related activities as well as their performance results and relevant targets to its stakeholders.	Annual Report Sustainability Section (p. 53) Sustainability Report (p. 12) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr
	D. Corporate Governance Prin	ciples					
D1	Should consult with stakeholders in determination of measures and strategies in sustainability field.	х				In 2021, 14 different stakeholder groups consulted while updating Otokar's material sustainability aspects to be used in determining the company's sustainability models and strategies.	Annual Report Sustainability Section (p. 53) Sustainability Report (p. 13) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr
D2	Should endeavor to raise awareness on sustainability and the importance thereof through social responsibility projects, awareness activities and trainings.	x				As a company that is conscious of its corporate responsibilities, Otokar takes an active role in supporting the development of the country and society and protecting the environment. Otokar also supports the "For My Country" project, which aims to encourage Koç Group companies, employees, dealers and suppliers to engage in social responsibility efforts and to launch projects to elevate the living standards by contributing to local development. Otokar's environment-focused efforts have been recognized with multiple awards by institutions such as the Ministry of Environment, Sakarya Governor's Office, Istanbul Chamber of Industry, Adapazar Chamber of Commerce and Industry, and Kocaeli Chamber of Industry. Otokar is also one of the first automotive companies to operate with ISO 14001 certification.	Annual Report Sustainability Section (p.55) Sustainability Report (p. 40, 41, 42) https://www.otokar.com.tr/ getmedia/03132b39-432f-4a75- 8a83-b6c51000aec1/otokar-sr-tr