

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 generally accepted best 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 currently lack full compliance.

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.

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.
Principle B15 - While the company discloses the administrative and investment costs of environmental management activities, the returns on the efficiency-focused activities are not declared.
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, 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 97-105), and the relevant documents can be accessed through 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>). In accordance with the Public Oversight, Accounting and Auditing Standards Authority's decision dated December 29, 2023, the report to be prepared in compliance with the Türkiye Sustainability Reporting Standards (TSRS) will be disclosed to the public within the statutory timeframe.

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SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

		COMPLIANCE STATUS				Explanation	Report/Link Where Related Information Is Disclosed Publicly
		Yes	No	Partial	N/A		
A. General Principles							
A1. Strategy, Policy and Goals							
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				<p>At Otokar, the Board of Directors is the highest governing body that oversees the company's activities, led by the General Manager in coordination with all executives. Otokar adopts a risk policy that is spread and supported across all levels of the organization, and implemented in line with the company's strategies with the aim of anticipating and monitoring any potential risks that may prevent the company from reaching its goals, and drawing up action plans to address such risks. The Risk Management Committee has been established to anticipate and assess any strategic, operational, financial, legal, sustainability and other risks that may jeopardize Otokar's existence, growth and continuity, calculate the impact and probability of such risks, report and manage these risks according to the company's risk profile, and submit recommendations concerning the implementation of the necessary measures against such risks, taking them into consideration in decision-making processes, and establishing and integrating effective internal control mechanisms.</p> <p>The evolving landscape of climate change and sustainability presents systemic risks as well as emerging opportunities that may impact Otokar's operations. In response, the company adopts an integrated and structured risk management approach for the early identification, assessment, prioritization, monitoring and mitigation of climate-related risks and opportunities. At Otokar, the processes of identifying, evaluating and monitoring risks and opportunities are carried out in accordance with the "Otokar Corporate Risk and Opportunity Management Procedure," aligned with the ISO 31000 standard. Climate change and sustainability-related risks are integrated into these existing risk management processes.</p>	<p>Annual Report Sustainability Section (pages 52-73)</p> <p>Sustainability Report (page 24) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p> <p>TSRS-Compliant Sustainability Report (page 23) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu</p>
	Should determine a Corporation Strategy in compliance with ESG policies, risks and opportunities.	X				Otokar's ESG policies are publicly available on the corporate website (link in the next column).	www.otokar.com.tr/surdurulebilirlik
A1.2	Should determine and publicly disclose its short and long-term goals in line with its ESG policies.	X				In addition to several targets tracked with scorecards in many areas within the scope of ESG policies, including environment and occupational safety, the Company's goals aligned with Otokar's material sustainability topics have been disclosed in the 2024 Sustainability Report.	<p>Annual Report, Declaration of Compliance with Sustainability Principles (page 95)</p> <p>Sustainability Report (page 33) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p>
A2. Implementation / Monitoring							
A2.1	Should appoint and publicly disclose its committees/units in charge of implementation of ESG policies.	X				The Board of Directors is the governing body responsible for setting the strategic direction for Otokar's social, economic and environmental issues. As with all other areas of operation, sustainability strategy and direction is also determined by the Board of Directors, which oversees the senior management's sustainability performance. At the executive level, the Sustainability Committee, headed by the General Manager, coordinates sustainability efforts. The committee is responsible for developing, implementing and monitoring sustainability strategies. It also identifies material sustainability topics, reviews and approves annual targets and monitors performance indicators. The committee plays an active role in monitoring greenhouse gas emission reduction efforts, evaluating sustainable finance opportunities and following relevant regulation. Developments and decisions are reported to the Board of Directors through the General Manager.	<p>Annual Report Sustainability Section (pages 52-73)</p> <p>Sustainability Report (page 27) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p>
	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.	X				The Board of Directors is kept up to date about the efforts to comply with the Sustainability Principles through the Corporate Governance Committee.	Sustainability Report (page 21) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu

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A2.2	Should formulate and publicly disclose the implementation and action plans in line with the short and long-term goals determined as above.	X				Otokar has designed a sustainability strategy with the aim of maintaining its domestic capital structure and profitability. Sensitivity to the environment, people and communities, commitment to universal human rights and code of ethics, operational excellence and focus on customer satisfaction, developing high-tech, value-added products form the pillars of this strategy. As a responsible company that promotes stakeholder participation, Otokar aims to strengthen its business strategy in the automotive and defense industries. On this path, the company strives to fully adhere to the laws and regulations in the regions where it operates, apply global sustainability standards, and respect the environment, people and the future. The material topics and targets within this framework have been disclosed publicly.	Annual Report Sustainability Section (pages 52-73) Sustainability Report (page 28-33) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024
A2.3	Should determine ESG Key Performance Indicators (KPIs) and declare them comparatively on an annual basis.	X				ESG KPIs and their evolution over the years are published in the Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
A2.4	Should declare innovation activities aimed to improve the sustainability performance in relation with business processes or products and services.	X				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 (pages 52-73) Sustainability Report (page 48) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
A3. Reporting							
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 Sustainability Reports as well as 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 (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
A3.2	It should provide information as to with which of the United Nations (UN) 2030 Sustainability Development Goals its activities are related.	X				Otokar publicly discloses its activities in areas identified as material topics through Annual and Sustainability Reports and provides information about how the relevant KPIs are aligned with different SDGs.	Annual Report Sustainability Section (pages 52-73) Sustainability Report (page 33) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
A3.3	It should disclose information about lawsuits filed and/or completed against it in environmental, social and corporate governance issues.	X				All materially significant lawsuits filed against the Company and their financial consequences are disclosed to the public in the Legal Disclosures section of the Annual Reports.	Annual Report, Legal Disclosures Section (pages 80-81)
A4. Verification							
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.	Sustainability Report (page 106) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu TSRS-Compliant Sustainability Report (page 30) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu

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B. Environmental Principles							
B1	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. Through the Environmental Policy, Otokar expresses 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's operations are certified according to the ISO 14001 Environmental Management System	Annual Report Sustainability Section (pages 52-73) Sustainability Report (page 79) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu Environmental Policy: https://www.otokar.com.tr/surdurulebilirlik/cevre-politikasi
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.	X				Information on the environmental reporting scope, period and limitations is provided in the Sustainability Reports.	Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B3	Provided in A2.1.						
B4	Should disclose the incentives it offers for management of environmental issues, including the achievement of goals.	X				Environmental targets are included in the scorecards of company managers and employees, and environmental performance, monitored with a scorecard system, is reported to the General Manager and the Board of Directors. In measuring individual performance, consideration is given not only to financial results but also to long-term value creation and adherence to environmental, social, and governance (ESG) principles. Sustainability targets are integrated into Otokar's Objectives and Key Results (OKR) system and cascaded throughout the organization. In determining these indicators, GRI standards, environmental issues, industry norms and requirements, and Koç Group's material environmental topics 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 (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B5	Should disclose how environmental issues are integrated into business objectives and strategies.	X				Climate-related risks and opportunities are integrated into Otokar's overall strategic planning and operational management cycles. Risk reviews are recorded in the Company's digital infrastructure, monitored on a regular basis and updated as needed. All relevant process owners at Otokar are responsible for monitoring corporate risks and opportunities. Climate-related risk and opportunities are also systematically incorporated into investment decisions, new product development processes and supply chain management. The outcomes of risk assessments serve as a guide for key decision areas such as capital allocation, R&D priorities and business continuity plans. Through this comprehensive approach, Otokar not only builds resilience against current risks but also aims to fully capitalize on strategic opportunities presented by the transition to a low-carbon economy.	TSRS-Compliant Sustainability Report (page 24) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu
B6	Provided in A2.4.						
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 does not limit its environmental management approach to its own operations; it aims to extend it across the entire value chain. Accordingly, compliance with environmental regulations and relevant standards is a key criterion in supplier selection, and suppliers' environmental performance is monitored through self-assessment surveys. The Company has already started to implement actions to improve the environmental and social performance of suppliers and plans to deepen its work with suppliers regarding climate change and carbon emissions in the times to come.	TSRS-Compliant Sustainability Report (page 10) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu

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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 TÜSİAD, which provide platforms for Otokar to engage with businesses in proximity. Such engagements facilitate discussions and collaborations regarding legislative changes, EU compliance directives, local sanctions, and investments. These collaborations are disclosed to the public through Annual Reports and Sustainability Reports.	Sustainability Report (page 30) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar
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), Scope-3 (Other indirect)), air quality, energy management, water and waste water management, waste management, biodiversity effects].			X		Otokar monitors the energy consumed and greenhouse gas emissions released in the production processes and launches efficiency projects to reduce energy consumption and emissions. With 2021 taken as baseline, 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) and the 2023 data by QSI Certification & Inspection (QSI Belgelendirme Muayene ve Test Hizm. Ltd. Şti.). Calculations were also made with Carbon Trust in accordance with the GHG standard. In 2024, Scope 1-2-3 emission calculations and verification were performed in compliance with the ISO 14064-1:2006 standard, the GHG Protocol, and IPCC 2006 Tier 1 methodology. Moreover, target modeling and feasibility studies were conducted for Scope 1 and Scope 2 emissions.	Sustainability Report (page 81) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B10	Should disclose details in relation to standards, protocols, methodologies and base year employed for collection and calculation of its data.	X				In addition to B9, the emission factors used in emission calculations are obtained from scientific sources such as the IPCC and the GHG Protocol, and updated for alignment with local conditions.	Sustainability Report (page 81) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu TSRS-Compliant Sustainability Report (page 25) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu
B11	Should declare the status of environmental indicators for the reporting year in comparison with past years (increase or decrease).	X				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.	Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
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			In addition to several targets monitored with scorecards in many areas within the scope of ESG policies, including environment and occupational safety, the company's goals aligned with its material sustainability topics have been disclosed to the public.	Sustainability Report (page 33) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B13	Should disclose its strategy and actions for fight against climate crisis.	X				Otokar systematically analyzes the potential impacts of climate change on its business model, operational processes, and financial performance, and positions the transition to a low-carbon economy as a strategic priority. The Company's climate action efforts are overseen by the Board of Directors and guided by its Environmental Policy, Energy Policy, R&D Strategy, and the Koç Group Climate Change Strategy and Management. Otokar plays an active role in Koç Holding's Carbon Transition Program toward the 2050 net-zero target.	Sustainability Report (page 81) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu

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B14	Should disclose its programs or procedures aiming to prevent or minimize the potential negative effects of its products and/or services.	X				Information on the alternative fuel vehicles with reduced environmental impact and the improvement efforts in this area is provided in Annual Reports and Sustainability Reports.	Annual Report Sustainability Section (pages 52-73) Sustainability Report (page 48, 82) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu TSRS-Compliant Sustainability Report (page 7-10) https://www.otokar.com.tr/getmedia/b4c42e3d-2718-4842-9dfd-4871e70099dc/otokar-2024-tsrs-uyumlu-surdurulebilirlik-raporu
	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 (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/47eb9cea-1c36-49b7-84b9-d95db4985b5c/otokar-sr-tr-2023-1
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			While 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 (pages 97-105)
B16	Should report total energy consumption data (with the exception of raw materials), and disclose its energy consumptions as Scope-1 and Scope-2.	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B17	Should provide information about electricity, heat, steam and cooling generated and consumed in the reporting year.	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B18	Should carry out and disclose works on increasing the use of renewable energy sources, and transition to zero or low carbon electricity.	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B19	Should conduct energy efficiency projects, and disclose the resulting reduction in energy consumption and emission due to its projects.	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
B20	Should conduct energy efficiency projects, and disclose the resulting reduction in energy consumption and emission due to its projects.	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
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.).	X				Relevant data is disclosed publicly through the annual Sustainability Reports.	Sustainability Report (pages 81-85) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
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).	X				Otokar regularly monitors export processes related to its product groups within the iron & steel and aluminum sectors, covered by the Carbon Border Adjustment Mechanism (CBAM), which was introduced by the EU as part of the European Green Deal, and continues to evaluate compliance with applicable legislation. As of 2025, these assessments have not revealed any additional obligations or significant risks requiring public disclosure.	Annual Report Sustainability Section (page 67)
B23	Should disclose its carbon credit data accumulated or bought in the reporting period.	X				Otokar regularly monitors export processes related to its product groups within the iron & steel and aluminum sectors, covered by the Carbon Border Adjustment Mechanism (CBAM), which was introduced by the EU as part of the European Green Deal, and continues to evaluate compliance with applicable legislation. As of 2025, these assessments have not revealed any additional obligations or significant risks requiring public disclosure.	Annual Report Sustainability Section (page 67)

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B24	If carbon pricing is applied in the corporation, it should disclose details relating thereto.	X				Otokar regularly monitors export processes related to its product groups within the iron & steel and aluminum sectors, covered by the Carbon Border Adjustment Mechanism (CBAM), which was introduced by the EU as part of the European Green Deal, and continues to evaluate compliance with applicable legislation. As of 2025, these assessments have not revealed any additional obligations or significant risks requiring public disclosure.	Annual Report Sustainability Section (page 67)
B25	Should disclose all mandatory and voluntary platforms where its environmental data are disclosed.	X				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 (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
C. Social Principles							
C1. Human Rights and Employee 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 Türkiye. Should disclose the aforesaid policy and the roles played and responsibilities assumed in the implementation of the policy.	X				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 nondiscrimination 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.	X				These issues are disclosed in Otokar Human Rights Policy.	www.otokar.com.tr/etik-ilkeler-ve-uyum-politikalari/etik-ilkeler-ve-uyum-politikalari
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.).	X				Otokar's 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's Supply Chain Compliance Policy.	Annual Report Sustainability Section (pages 52-73) Sustainability Report (page 51,52) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu Policies https://www.otokar.com.tr/getmedia/6c9e6743-55ee-473e-bc55-4bc140d81c38/otokar-tedarik-zinciri-uyum-politikasi-2024 https://www.otokar.com.tr/etik-ilkeler-ve-uyum-politikalari/etik-ilkeler-ve-uyum-politikalari
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.	X				These issues are also disclosed in the Human Rights Policy and Supply Chain Compliance Policy.	Annual Report Sustainability Section (pages 52-73) Sustainability Report https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu Policies https://www.otokar.com.tr/etik-ilkeler-ve-uyum-politikalari/etik-ilkeler-ve-uyum-politikalari https://www.otokar.com.tr/getmedia/6c9e6743-55ee-473e-bc55-4bc140d81c38/otokar-tedarik

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SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

		COMPLIANCE STATUS				Explanation	Report/Link Where Related Information Is Disclosed Publicly
		Yes	No	Partial	N/A		
C1.5	Should disclose its policies regarding investments in employees (training and development policies), compensations, fringe benefits, unionization rights, work/life balance solutions and talent management.	X				These issues are also disclosed in Otokar's Code of Ethics and Human Rights Policy and available under the Human Resources tab on the website.	www.otokar.com.tr/surdurulebilirlik/ www.otokar.com.tr/etik-ilkeler-veyum-politikalari/etik-ilkeler-veyum-politikalari www.otokar.com.tr/insan-kaynaklari-kariyer/
	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 Otokar's Whistleblowing Policy, Code of Ethics, and Human Rights Policy.	www.otokar.com.tr/surdurulebilirlik/ www.otokar.com.tr/etik-ilkeler-veyum-politikalari/ www.otokar.com.tr/etik-ilkeler-veyum-politikalari/
	Regularly declares its activities aimed at employee satisfaction.	X				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.	https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu https://www.otokar.com.tr/etik-ilkeler-veyum-politikalari/etik-ilkeler-veyum-politikalari
C1.6	Should formulate and disclose its occupational health and safety policies.	X				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 the 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 Sustainability Report (page 63-66) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
	Should disclose actions and measures taken for protection of health and against occupational accidents, and occupational accident statistics.	X				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 (pages 52-73) Sustainability Report (page 63) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
C1.7	Should formulate and disclose to public its personal data protection and data security policies.	X				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-veyum-politikalari/etik-ilkeler-veyum-politikalari
C1.8	Should formulate and disclose its ethics policy.	X				Otokar Code of Ethics is published on the corporate website.	www.otokar.com.tr/etik-ilkeler-veyum-politikalari/etik-ilkeler-veyum-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 (pages 52-73) Sustainability Report (page 63) https://www.otokar.com.tr/getmedia/47eb9cea-1c36-49b7-84b9-d95db4985b5c/otokar-sr-2023-1

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SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

		COMPLIANCE STATUS				Explanation	Report/Link Where Related Information Is Disclosed Publicly
		Yes	No	Partial	N/A		
	C. Social Principles						
	C2. Stakeholders, International Standards and Initiatives						
C2.1	Should formulate and disclose its customer satisfaction policy dealing with management and resolution of customer complaints	X				<p>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 Customer Satisfaction Policy and 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.</p> <p>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.</p>	<p>Annual Report Sustainability Section (pages 52-73)</p> <p>Sustainability Report (page 44-45) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p> <p>https://www.otokar.com.tr/surdurulebilirlik/musteri-memnuniyeti-politikasi</p>
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				<p>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 a 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. Communication with the stakeholders is always constructive, transparent and based on mutual trust and cooperation. As part of stakeholder communications, Otokar supports the activities of NGOs and platforms by becoming a member and taking responsibility in such organizations' management bodies.</p>	<p>Sustainability Report (page 29) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p>
C2.3	Should disclose international reporting standards it has adopted.	X				<p>GRI Standards are taken as basis in sustainability reporting. In addition to utilizing LSEG and SASB performance criteria, the report also provides information about the company's contribution to the UN SDGs.</p>	<p>Annual Report Sustainability Section (pages 52-73)</p> <p>Sustainability Report (page 2) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu</p>

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SUSTAINABILITY PRINCIPLES COMPLIANCE REPORT

		COMPLIANCE STATUS				Explanation	Report/Link Where Related Information Is Disclosed Publicly
		Yes	No	Partial	N/A		
C2.4	Should disclose the international organizations or principles it has signed or enrolled in and the international principles it has adopted.	X				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.	Sustainability Report (page 30, 80, 89) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
C2.5	Should concretely endeavor to be included in the Borsa İstanbul 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 focused efforts. 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. Otokar is also included in the ESG rating of the LSEG.	Sustainability Report (page 8, 31) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
	D. Corporate Governance Principles						
D1	Should consult with stakeholders in determination of measures and strategies in sustainability field.	X				In 2024, opinions from 14 different stakeholder groups were included in the evaluation process for revising Otokar's material sustainability topics to be used in determining the Company's sustainability priorities and strategies.	Sustainability Report (page 28) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu
D2	Should endeavor to raise awareness on sustainability and the importance thereof through social responsibility projects, awareness activities and trainings.	X				Otokar aims to support the development and welfare of its communities, drawing from the motto of the late Vehbi Koç, the founder of Koç Holding, who said, 'I exist if my country exists.' Adopting a responsible corporate citizenship approach, Otokar also contributes to the social, environmental and economic development of society in line with the sustainable development goals. All the activities carried out for these purposes are guided by the principles defined in the Social Investment Policy, which forms an integral part of Otokar's Code of Ethics. Information on activities that support students' development and contribute to environmental initiatives is disclosed publicly through Annual Reports and Sustainability Reports.	Sustainability Report (page 87, 88, 89) https://www.otokar.com.tr/getmedia/f395f674-c3cf-4406-9907-397ff27146e4/otokar-2024-surdurulebilirlik-raporu