

# Disclosure Policy

## DISCLOSURE POLICY

CAGDAS CAM SANAYI VE TICARET JOINT STOCK COMPANY (the "Company")

## DISCLOSURE POLICY

### 1. Purpose

The purpose of the disclosure policy is, in compliance with the regulations to which the Company is subject and the provisions of its Articles of Association, to ensure active, effective, and transparent communication by sharing, with all stakeholders including shareholders, investors, employees, customers, and relevant competent authorities, all kinds of information that does not constitute a trade secret fully, fairly, accurately, timely, in an understandable manner, at low cost, and easily accessible, and simultaneously.

In matters of public disclosure, the Company complies with the Capital Markets Law No. 6362 ("CML"), the Turkish Commercial Code No. 6102 ("TCC"), capital markets legislation, other relevant legislation and regulations, and the regulations of Borsa Istanbul A.S. ("BIST"). The Company shows utmost care to realize the principles set out in the Corporate Governance Principles regulated in the Capital Markets Board's ("CMB") current Communiqué on Corporate Governance, which may be amended from time to time.

According to Article 12 of the Company's Articles of Association titled 'Disclosure, Public Disclosure and Announcements':

"The Company fulfills its obligations to provide information to the CMB within the procedures and principles set out in the capital markets legislation. Financial statements and reports as well as independent audit reports that are required to be prepared by the CMB are announced to the public within the procedures and principles set out in the relevant provisions of the TCC and capital markets legislation.

Announcements of the Company are made in accordance with the provisions of the TCC, capital markets legislation, and relevant legislation, within the specified periods and on time. Material event disclosures to be made in accordance with the regulations of the CMB and all kinds of disclosures to be required by the CMB are made within the specified periods and on time in compliance with the relevant legislation."

The Company's Disclosure Policy has been prepared in accordance with Article 17 of the CMB's Communiqué on Material Events (II-15.1) and the Communiqué on Corporate Governance (II-17.1) and is announced to all stakeholders via the Company's website <https://tr.cagdascam.com/>.

### 2. Authority and Responsibility

The Disclosure Policy is established by the Board of Directors within the framework of the CMB Corporate Governance Principles and presented to the information of shareholders at the Company's general assembly. The Company's authority and responsibility for public disclosure and for monitoring, oversight, improvement, and necessary updates of the disclosure policy lie with the Board of Directors. Changes to the Disclosure Policy are published on the Company's website at <https://tr.cagdascam.com/> following the approval of the Board of Directors. The Investor Relations Department has been assigned to oversee and monitor all issues related to public disclosure. All questions regarding the procedures and principles of this policy's implementation should be addressed to the Investor Relations Department.

### 3. Methods and Instruments of Disclosure

Within the framework of the Disclosure Policy, the methods and instruments of disclosure used by the Company are as follows: periodic submissions of financial statements, independent auditor reports and representations to the Public Disclosure Platform (KAP); annual activity reports; the Company's website (<https://tr.cagdascam.com/>); material event disclosure forms; announcements and notices made via the Turkish Trade Registry Gazette and daily newspapers; investor presentations, factsheets and all channels used in communication with investors including social media; and communication via telephone, e-mail, and fax.

Factory stoppages within the ordinary course of business are not disclosed on KAP unless they exceed 10 business days.

### 4. Principles Regarding Presentations and Reports Disclosed at Information Meetings or Press Conferences

Information requests transmitted to the Company by shareholders, investors, and analysts are responded to in writing, verbally or through information meetings by the Investor Relations Department within the framework of publicly disclosed information, ensuring accuracy, completeness, and the principle of equality.

Including forward-looking assessments, matters subject to material events may be announced to the public by utilizing press and media outlets, holding press conferences and/or issuing press releases, and other means of communication. Before or simultaneously with such public announcements regarding material events, a disclosure is also made on KAP and the relevant disclosure is also included on the Company's website.

From time to time, Company officials may attend national and international conferences or meetings to share information with investors and analysts. Presentations and reports used at these events may be published on the Company's website.

### 5. Principles Regarding Monitoring News and Rumors about the Company in the Press/Media or on Websites and Making Related Disclosures

The Company monitors news and rumors in national or international press/media, websites, and other communication channels through a media monitoring company.

As a principle, the Company does not comment on speculations in press/media, websites, and other communication channels. The General Manager and the Investor Relations Department assess whether any news or rumor will have an impact on the value of the Company's shares and investors' decisions and decide whether a material event disclosure should be made. If it is concluded that the news and rumors may affect the value of the Company's shares and investors' decisions, a material event disclosure is made on the matter. The Chairman of the Board of Directors, the General Manager, or the Head of the Investor Relations Department are authorized to make such material event disclosures on behalf of the Company.

#### 6. Measures to Ensure Confidentiality Until Material Events Are Announced to the Public

Until material events are announced to the public, Company management is responsible for ensuring the confidentiality of the relevant information. In this context, employees who have access to such information may not share it with third parties until a material event disclosure is made. The Company may postpone the public disclosure of inside information in order to prevent harm to its legitimate interests, provided that this would not mislead investors and that it is able to ensure the confidentiality of such information. In such cases, the Company takes all necessary measures to ensure the confidentiality of inside information pursuant to capital markets legislation. If it is determined that inside information has been disclosed to third parties and it is concluded under capital markets regulations that confidentiality cannot be ensured, a material event disclosure is made immediately. As soon as the reasons for postponing the public disclosure of inside information cease to exist, a public disclosure is made in accordance with the legislation. The postponement decision and its underlying reasons are stated in the disclosure to be made.

The Company informs its managers and employees, through in-service training, about the obligations in the law and relevant legislation regarding inside information and the sanctions related to the misuse or dissemination of such information. The Company takes necessary measures, such as obtaining confidentiality undertakings and similar methods, to prevent access to such information by employees other than those on the list of persons with access to inside information and third parties from whom services are procured. Persons with access to inside information are informed in writing, against signature, regarding the obligations under the law and relevant legislation concerning inside information and the sanctions related to the misuse or dissemination of such information.

#### 7. Principles Used in Identifying Persons with Administrative Responsibility

Within the framework of capital markets legislation, 'Persons with Administrative Responsibility' are defined as (i) members of the Company's board of directors, and (ii) persons who, although not board members, have the authority to regularly access the

Company's inside information directly or indirectly and to take administrative decisions affecting the Company's future development and commercial objectives.

In our Company, persons with administrative responsibility are identified as members of the Board of Directors, the General Manager, and managers reporting to the General Manager.

#### 8. Principles Regarding the Disclosure of Forward-Looking Assessments

Assessments containing plans and estimates that qualify as inside information regarding the future or that give investors an idea about the Company's future activities, financial condition, and performance may be disclosed to the public within the principles set out in the capital markets legislation. If forward-looking information has been publicly disclosed, it is announced together with the assumptions and past realizations on which the assumptions are based. If it is later understood that the forward-looking estimates will not be realized to a significant extent, such information is reviewed and revised.

Forward-looking assessments are based on reasonable assumptions and estimates. In case of deviations due to unforeseeable risks and developments, if there is a significant difference between previously disclosed matters and actual realizations, a public disclosure is made, including the reasons for such differences. The Chairman of the Board of Directors and the General Manager are authorized to disclose the Company's forward-looking assessments.

Forward-looking assessments may also be made by utilizing press/media, press conferences, press releases, national and international conferences or meetings, and other communication methods, in addition to material event disclosures, within the framework of the principles in the capital markets legislation.

#### 9. Company Website (<https://tr.cagdascam.com/>)

In public disclosure, the Company's website (<https://tr.cagdascam.com/>) is actively used as recommended by the CMB Corporate Governance Principles. The explanations on the Company's website do not substitute for notifications and material event disclosures required to be made under capital markets legislation. Access to all public disclosures made by the Company is provided through the website. The website is structured and segmented accordingly. All necessary measures are taken regarding the security of the website. The website is arranged in the content and manner envisaged by the CMB Corporate Governance Principles. In particular, announcements regarding general assembly meetings to be held, the information document regarding the agenda items, other information, documents and reports related to the agenda items, and information on the methods of participation in the general assembly are prominently included on the website. Efforts to improve the website continue on an ongoing basis.