



TÜRKİYE ŞİŞE VE CAM FABRİKALARI A.Ş. DISCLOSURE POLICY

1) Purpose

The Türkiye Şişe ve Cam Fabrikaları A.Ş. ("Şişecam" or "Company") Disclosure Policy outlines the procedures and principles for ensuring that relevant information and explanations, excluding confidential commercial information, are disseminated on a timely basis, comprehensively, and clearly to shareholders, investors, employees, customers and other interested third parties equitably and at the lowest possible cost in accordance with applicable laws and regulations.

The Disclosure Policy applies to all employees and external consultants of Şişecam and governs Şişecam's written and verbal communications with capital market participants.

The Disclosure Policy is aligned with Article 17 of the Capital Markets Boards' Communiqué On Material Events Disclosure Series no. II 15.1 and is readily accessible to all stakeholders via the Şişecam website (www.sisecam.com). The Company may delay the public disclosure of information that could harm its legitimate interests if disclosed and/or constitutes a confidential commercial information, in accordance with applicable legal and regulatory principles.

2) Authority and Responsibility

Şişecam discloses all financial information, explanations, and notices related to the Capital Market Law and Legislation, Turkish Commercial Code, and Borsa İstanbul A.Ş. ("BİAŞ") Legislation in accordance with generally accepted financial reporting standards and corporate governance principles and maintains a comprehensive information policy.

Şişecam is committed to adopting and implementing corporate governance principles, ensuring compliance with relevant legislative requirements and international best practices in public disclosure and information. The Board of Directors is responsible for overseeing, supervising, and developing Şişecam's public disclosure and information policy.

Financial management and reporting managers and the investor relations department are responsible for coordinating the information function. These officials coordinate the information function in close cooperation with the Board of Directors.

3) Public Disclosure Activities: Efforts, Methods & Tools

In accordance with the Capital Market Law, Turkish Commercial Code, and other relevant legislation, Şişecam's public disclosure methods and tools are set out below.

- Quarterly consolidated financial reports, its footnotes and explanations prepared in accordance with Capital Markets Board (CMB) regulations, interim Board of Directors Activity Reports, mid-term and year-end independent audit reports and year-end Board of Directors Activity Reports are submitted to the Public Disclosure Platform (PDP) within the specified legal deadlines and published on the Şişecam website (www.sisecam.com). Financial statements are presented to the Board of Directors for approval by the Audit Committee, which also provides an opinion on their compliance. Subsequently, they are signed by Şişecam's authorized financial reporting managers with a declaration of accuracy and are disclosed to the relevant authorities via the Public Disclosure Platform (PDP) by financial reporting officials who possess a "qualified electronic certificate." Officials responsible for PDP disclosures are selected from among those authorized to represent and bind the Company. Operating results of the relevant period and other material events are publicly disclosed through the investor bulletins (Earning Release), investor presentations and press releases that are published on the Şişecam website in conjunction with quarterly operating results announcements. Publicly disclosed financial statements are translated into English, disseminated to relevant parties, and published on the Şişecam website. Following the announcement of year-end financial statements, stakeholder inquiries are addressed by the Chairperson and/or the CEO at the ordinary general assembly meetings. The Corporate Governance Compliance Report (CGCR), Corporate Governance Information Form (CGIF), and Sustainability Principles Compliance Report are disclosed on the Public Disclosure Platform (PDP) and the Şişecam website, in conjunction with the relevant period's Annual Activity Report.
- Material event disclosures mandated by CMB legislation are submitted electronically to the Public Disclosure Platform within the specified timeframe. Material event disclosures are issued in a timely, accurate, clear, and comprehensive manner, free from misleading statements, to enable individuals and organizations to make informed decisions. Material event disclosures are electronically signed by individuals responsible for financial reporting and possessing a "qualified electronic certificate" before being submitted to the relevant authorities. Officials responsible for material event disclosures are selected from among those authorized to represent and bind the Company. In addition, material event disclosures are electronically sent to the Public Disclosure Platform and simultaneously published on the Company's website within one business day. These disclosures are archived on the website for a minimum of five (5) years. Material disclosures may be delayed under certain circumstances specified in relevant regulations.

- For events such as Articles of Association amendments, general assembly meetings, and capital increases, required announcements and notifications are made through the Public Disclosure Platform (KAP) and the Trade Registry Gazette. Additionally, Turkish and English versions are published on the Şişecam website.
- The Annual Activity Report is prepared in Turkish each year before the General Assembly meeting, incorporating essential information and explanations. It is presented to shareholders for review and subsequently published on the Şişecam website. Printed copies can be obtained from the Şişecam Investor Relations Department. In addition, Board of Directors Annual Activity Reports are translated into English promptly following the General Assembly meetings and published on the Şişecam website.
- When necessary, press releases are issued by authorized officials through written and visual media.
- Information is disseminated to shareholders and other relevant parties through local and international investor meetings and investor roadshows. Investor Relations Department-conducted meetings and roadshows are attended by the Chief Executive Officer (CEO), Chief Financial Officer (CFO), and investor relations managers, whenever feasible. These contact teams can be expanded as needed.
- Following the announcement of mid-term and year-end financial results, and in other relevant circumstances, information is disseminated to shareholders and other relevant parties through teleconferences. These teleconferences are coordinated by the Investor Relations Department.
- Presentations and reports announced at investor meetings, teleconferences, and press conferences are also archived in the "Investor Relations" section on the Şişecam website, ensuring equitable and timely access to all market participants.
- Information requests from shareholders, investors, and analysts are responded to by the Investor Relations Department through written communications, verbal responses, or information meetings, ensuring accuracy, completeness, and equitable treatment, consistent with publicly disclosed information. Material issues, including forward-looking statements, may also be publicly announced through press and media outlets, press conferences or press releases, or other relevant communication channels. Material event disclosures are submitted to the Public Disclosure Platform (KAP) prior to or concurrently with public announcements and are also archived on the Company's website.

- Şişecam utilizes its corporate website (www.sisecam.com) to foster efficient and timely communication with shareholders. This commitment aligns with the transparency and continuous stakeholder engagement principles outlined by the CMB Corporate Governance Principles. The information on the Company's corporate website is consistent with legally mandated statements and is free from contradictions or omissions. In addition to legally mandated disclosures, the Company's corporate website features trade registry information, current shareholding and management structure, absence of privileged shares, latest version of the Articles of Association along with the trade registry gazette date and publication details of amendments, material event disclosures, financial reports, activity reports, investor bulletins (earnings releases), investor presentations, teleconference transcripts, prospectuses and international offering circulars, general assembly information documents, general assembly announcements, general assembly meeting agendas, lists of attendees and general assembly meeting minutes, proxy voting forms, Profit Distribution Policy, Disclosure Policy, Company Code of Conduct, and frequently asked questions. The Company's corporate website archives information for at least the last five (5) years. In addition, an email address (sc_ir@sisecam.com) is available for electronic information requests, further facilitating communication with stakeholders. The Company's corporate website provides information in English to accommodate international investors.
- Şişecam regards analyst reports prepared by institutions as the property of those institutions and does not publish the reports on the Company's website (www.sisecam.com). Şişecam does not review, verify, endorse, take responsibility for, or distribute analyst reports or valuation models. In limited and specific circumstances, analyst reports may be reviewed upon request to address potential public misinformation. However, such reviews are confined to publicly available and retrospective historical information and must be on a limited basis.
- Information on sell-side analysts who cover Şişecam and publish reports about the Sisecam, including their intermediary institution and contact information, is published on the Company's website.
- Şişecam utilizes the Public Disclosure Platform, Şişecam website, CRA's e-Company and e-GEM platforms and/or the Turkish Trade Registry Gazette, adhering to the specified methods and tools outlined in CMB, BIST and TCC regulations. The choice of platform depends on the nature of the disclosure, announcement, or notice.
- Notifications not explicitly mentioned in the preceding sections (prospectuses, offering circulars, issuance documents, etc.) are publicly disclosed and published on the Şişecam website after being signed by authorized company officials.



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4) Investor Relations

Şişecam's Investor Relations Department conducts all interactions with investors, ensuring full compliance with stakeholder information rights.

Investor relations activities:

- Shareholder and investor information requests are addressed in accordance with applicable laws, the Articles of Association, corporate governance principles, and information policies.
- Coordination is ensured to fulfil the obligations arising from the Capital Market Legislation, encompassing all aspects of corporate governance and public disclosure.
- Contact details for officials responsible for shareholder communication are maintained and updated on the Public Disclosure Platform.
- Correspondence records and other relevant information and documents pertaining to investor communications are maintained accurately, securely, and up-to-date.
- Necessary efforts are made to maintain active communication with domestic and foreign investors through the website.
- Ensure that documents to be presented for the information and review of shareholders regarding the General Assembly meeting are prepared and made available.
- Measures are taken to ensure that the General Assembly meeting is conducted in accordance with the relevant legislation, the Articles of Association, and other internal regulations of the Company.

5) Postponement of Public Disclosure and Confidentiality of Insider Information

The Company may, at its discretion, postpone the public disclosure of insider information to protect its legitimate interests, provided that the information remains confidential and investors are not misled, in accordance with Article 6 of the CMB's Communiqué Regarding the Public Disclosure of Material Events no. (II-15.1). Upon resolution of the reasons for postponing public disclosure, the Company promptly discloses the relevant insider information pursuant to the principles outlined in the CMB's Communiqué Regarding the Public Disclosure of Material Events no. (II-15.1). The disclosure includes the decision to postpone public disclosure and the underlying reasons. If the anticipated event underlying the postponement of public disclosure does not materialize, disclosure may not be necessary. The Company implements robust measures to safeguard the confidentiality of insider information subject to postponed disclosure and to control access to this information. It restricts access to this information to those listed on the insider information list. Those granted access are informed about the Capital Market Legislation's provisions regarding insider information and the consequences of misuse or dissemination of this information. Confidentiality clauses are incorporated, if necessary, into agreements with individuals and organizations that are granted access to insider information due to their provision of specific services to Şişecam.



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Pursuant to the Capital Markets Board's Communiqué on Market Abuse no. VI-104.1, Şişecam informs individuals on the insider information list to refrain from using confidential, non-public information or trade secrets related to the Company for personal gain or to benefit others. Additionally, disseminating false or misleading information or spreading rumors about the Company is strictly prohibited, as such actions constitute market abuse.

During specific periods of the calendar year, information on operating results and other relevant matters is withheld from capital market participants to prevent unauthorized disclosure. These periods of the year are known as "silent periods." During silent periods, company officials refrain from commenting on the company's financial status inquiries from capital market participants such as analysts and investors, except for publicly disclosed information. During silent periods, individuals authorized to make public disclosures on behalf of the company may participate in conferences, panels, and similar events, and grant interviews to the media, provided they adhere to the confidentiality of insider information. In addition, Investor Relations Department officials may attend investor meetings, subject to the same confidentiality requirements. Silent periods commence on the first day following the conclusion of the fiscal semester and the annual accounting period and conclude with the public disclosure of the relevant interim or annual financial results.

A "blackout period" is implemented during which individuals with access to non-public information are prohibited from trading the Company's capital market instruments until the information is publicly disclosed in accordance with applicable regulations. The blackout period begins on the first day following the conclusion of the fiscal semester and the annual accounting period and concludes with the public disclosure of the relevant interim or annual financial results. Individuals with access to non-public information are notified that any transactions involving Şişecam capital market instruments by their spouses, children, or household members during the blackout period may be deemed as market abuse, in accordance with Article 4 of the CMB's Communiqué on Market Abuse No. VI-104.1.

6) Criteria for Identifying Individuals with Administrative Responsibilities

Individuals with administrative responsibilities are identified based on their position within the Company's organizational structure and the nature of the information they access.



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Individuals with administrative responsibilities and regular access to insider information include Board Members, Committee Members, CEO, Chief Officers, Coordinators, General Counsel, Senior Directors, Directors with comprehensive knowledge of Şişecam's overall operations and future plans, and Şişecam executives who possess access to company-wide information and have the authority to make administrative decisions that may impact financial reports, strategic targets and other significant aspects of the company. Executives and other personnel with administrative responsibilities who lack sufficient information to influence the value of capital market instruments and investor decisions, such as those with limited knowledge of the Company as a whole and access to only department-level information, are not considered as individuals with administrative responsibilities with access to insider information.

7) Individuals Authorized to Make Public Disclosures

Written and verbal information requests from capital market participants or any organization or individual are evaluated by the Investor Relations Department, and addressed following an evaluation on the content of the request, its confidentiality status and its potential impact on investment decisions and the value of capital market instruments, in accordance with the CMB's Communiqué Regarding the Public Disclosure of Material Events no. II - 15.1.

Press releases to printed and visual media and data distribution channels such as Bloomberg, Reuters, Forex, etc. can only be issued by the Chairperson, CEO, CFO, or other authorized company representatives.

Except when specifically assigned, Şişecam employees are not authorized to respond to inquiries from capital market participants. Incoming information requests are directed to the Investor Relations Department.

8) Public Disclosure on Forward Looking Statements

Forward looking statements encompass expectations that include plans and estimates constituting insider information about future prospects or that provide investors with insights into the Company's future activities, financial status, and performance. Public disclosure on forward looking statements is not mandatory. However, at the discretion of the Board of Directors or a Board-authorized representative, forward looking statements may be disclosed publicly, subject to their written approval.

Forward looking statements may be disclosed publicly up to four (4) times a year. Forward looking statements may be disclosed publicly through material disclosures, activity reports published in accordance with CMB financial statement regulations, or investor presentations, provided they are submitted to the Public Disclosure Platform. However, in the event of a significant change in publicly disclosed forward looking statements, additional disclosures may be made without restriction, in accordance with applicable legislation.

If a significant discrepancy arises between previously disclosed forward looking statements and actual results, the subsequent disclosure of forward looking statements must include an explanation for the difference.



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9) Media Coverage and Rumor Management

Şişecam monitors and tracks news and rumors related to the Company and its affiliates in media outlets or online through a professional media monitoring agency. When necessary pursuant to regulatory requirements, material disclosures are prepared following the compilation of relevant information from designated departments. When addressing media coverage of news and rumors that do not necessitate material disclosure under applicable legislation, the Company determines the method and content of its response based on the nature of the news, the target audience of the media outlet, and the potential impact on the Company's reputation. If a disclosure is made regarding news and rumors that necessitate material disclosure under applicable legislation, the Company will issue a material event disclosure in accordance with relevant legal provisions. Şişecam will assess the accuracy and sufficiency of news and rumors circulating in the media that could potentially influence investor decisions or the value of capital market instruments, originate from unauthorized sources, and deviate from previously disclosed information through material disclosures, prospectuses, circulars, CMB-approved announcement texts, financial reports or other public channels. Şişecam does not endorse or comment on third-party analyses, evaluations, or estimates about the Company based on publicly disclosed information.