

GALATA WIND ENERJİ A.Ş.

INFORMATION AND PUBLIC DISCLOSURE POLICY

1. Purpose

Galata Wind Enerji A.Ş.. (“**Galata Wind**” and/or “**the Company**”), as a general rule, primarily complies with the Capital Markets Legislation and the Turkish Commercial Code, as well as the regulations of Borsa Istanbul Inc. and the Central Registry Agency Inc. to provide timely, transparent, and accurate information to its investors, stakeholders, and the public as a publicly traded renewable energy company.

This Disclosure and Public Statement Policy applies to all information, except for information that constitutes commercial secrets, including the Corporate Governance Principles and Capital Markets Board (CMB) regulations, the Turkish Commercial Code, Borsa Istanbul A.Ş., Central Registry Agency A.Ş. regulations, the European Union Corporate Sustainability Reporting Directive (CSRD), and other national and international financial and sustainability reporting standards.

The main purpose of this policy is to ensure the following:

Transparency and Accountability: To provide investors, shareholders, and other stakeholders with complete, accurate, and understandable information within the scope of public disclosure obligations.

Disclosure of Financial and Sustainability Performance: To disclose information on financial position, operational performance, and environmental and social impacts in line with international best practices.

Compliance with Capital Markets Legislation: Ensuring full compliance with capital markets legislation, CMB regulations, and the disclosure requirements set by Borsa Istanbul A.Ş.

Protection of Competitive Advantage: Establishing the necessary procedures to protect sensitive commercial information and information that could affect market competitiveness.

Ease of Access to Information: Ensuring that stakeholders have timely and accurate access to the information they need.

Crisis and Emergency Management: Ensuring accurate, rapid, and effective communication in emergencies or crises.

This policy defines the framework for the company's communication with all its stakeholders and explains how financial, operational, and sustainability information is disclosed to the public. It also demonstrates the company's commitment to sharing information in an ethical and responsible manner.

2. Scope

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This Disclosure and Public Statement Policy covers all activities of Galata Wind Enerji A.Ş.. and regulates the Company's processes for sharing financial, operational, and sustainability-related information with the public, covering all of the following activities and processes:

This Policy covers the disclosure and public statement processes carried out by all departments of Galata Wind Enerji A.Ş: and its directly controlled subsidiaries. Suppliers, business partners, and other third parties are expected to act in accordance with this Policy.

2.1. Financial Disclosure

§ Disclosure of annual and interim financial reports

§ Significant developments regarding the company's financial performance

§ Investor relations activities and related announcements

2.2. Sustainability and Environmental, Social, and Governance (ESG) Disclosure

§ Sustainability goals, performance indicators, and strategies

§ Disclosures on carbon emissions, renewable energy investments, and climate change mitigation

§ Environmental and social impact assessments and public announcements

2.3. Disclosure of Inside and Continuous Information

§ Timely disclosure of developments that may affect the public in accordance with capital market legislation

§ Identification of persons with access to internal information and fulfillment of related obligations

§ Extraordinary circumstances, market rumors, and crisis management processes

2.4. Disclosure to Stakeholders and the Public

§ Announcements regarding the company's strategic decisions and management policies

§ Press releases, reports, and presentations for the public

§ Information meetings organized for shareholders and investors

This policy covers all information and disclosures made by Galata Wind Enerji A.Ş.. to all its departments, affiliates, suppliers, business partners, and relevant third parties. All parties directly

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or indirectly affected by the company are expected to act in accordance with the information processes carried out within the framework of this policy.

3. Definitions

The basic concepts used in Galata Wind Energy Inc.'s information and public disclosure processes are defined below within the scope of this policy. The definitions have been prepared taking into account the Capital Markets Board (CMB) Special Situations Announcement (II-15.1) and other relevant regulations.

Inside information: Defined as information that has not yet been disclosed to the public but could have a significant impact on the company's financial position, operations, or share price. Inside information is accessible to company management, certain employees, and authorized persons. The confidentiality of inside information must be maintained and not shared until it is disclosed to the public.

The confidentiality of inside information is protected until it is disclosed to the public; sharing this information with persons who do not need access to it is prohibited. Access to inside information is limited to persons who need this information for their duties and are included in the "List of Persons with Access to Inside Information."

Periodic Reports: Reports that must be disclosed to the public at specific intervals as required by law. Annual financial reports, interim financial reports, activity reports, and sustainability reports fall within the scope of periodic reports.

Continuous Information: Information and developments that do not fall within the scope of inside information but must be disclosed to the public in accordance with the Capital Markets Board's Special Situations Announcement (II-15.1). Transactions that must be disclosed to the public regarding the company's capital, management structure, activities, and financial position are considered continuous information. This scope includes transactions related to capital, amendments to the articles of association, general assembly decisions, statements regarding profit distribution, changes in the shareholding structure, and similar information specified in the Regulation.

Company Secret: A company secret is defined as commercial, strategic, or operational information that should not be shared with third parties in order to protect competitive advantage. The company's strategic plans, investment decisions, pricing policies, supplier contracts, and R&D projects may be considered company secrets.

Company Spokesperson: Refers to managers and units authorized to make official statements on behalf of Galata Wind. Individuals authorized to communicate with the media, investors, and other stakeholders on behalf of the company are determined by the board of directors. Unauthorized persons are prohibited from making public statements on behalf of the company.

Authorized Public Disclosure Channels

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- ® Public Disclosure Platform (KAP)
- ® The company's official corporate website
- ® Decisions and transactions published in the Turkish Trade Registry Gazette
- ® Press releases and media announcements
- ® Meetings, presentations, and reports for stakeholders and investors

Social Media Posts: The company's social media accounts are managed by the corporate communications and investor relations unit. Company employees and managers cannot make unauthorized comments or statements about the company on social media.

If false or misleading social media posts are detected, a corrective statement is made and the necessary legal proceedings are initiated.

List of Persons with Access to Inside Information: Managers, employees, and consultants within the company who have access to inside information are identified and recorded. This list is stored and updated in accordance with capital market legislation.

Extraordinary Circumstances and Crisis Communication: A rapid and coordinated communication strategy is implemented to protect the company's reputation and credibility in the event of market rumors, crises, or emergencies. The company makes statements in accordance with capital markets legislation against misleading news and speculation.

4. Basic Principles

As a publicly traded renewable energy company, Galata Wind Enerji A.Ş. conducts its information and public disclosure processes in accordance with the principles of transparency, accountability, accuracy, impartiality, and accessibility.

Within this framework, Galata Wind's information and public disclosure processes are conducted in accordance with the following fundamental principles:

- § All disclosures must be complete, accurate, timely, and understandable.
- § Disclosures must not contain misleading, incomplete, or speculative information and must present a true and fair view of the company's financial position and operations.
- § Information disclosed to the public must be consistent with the company's records and financial reports and must accurately reflect the current situation.
- § It is essential that information be provided to all stakeholders in an equal and fair manner.

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§ The disclosure process must be carried out without granting privileges to any stakeholder group.

§ Information must be provided to all stakeholders simultaneously in accordance with the standards set by regulatory bodies such as the Capital Markets Board (CMB), Borsa Istanbul, the European Union Corporate Sustainability Reporting Directive (CSRD), and the Public Oversight Authority.

§ Information that must be disclosed to the public must be announced without delay and within the timeframes specified by the relevant regulatory rules.

§ All disclosures must be made accessible through the company's corporate website and other appropriate communication channels, primarily the Public Disclosure Platform (KAP).

§ The company's investor relations unit is responsible for responding to stakeholder information requests in a timely and effective manner.

§ Galata Wind operates in full compliance with Capital Markets Board (CMB) regulations, the Special Situations Disclosure Regulation (II-15.1), Corporate Governance Principles, and Borsa Istanbul legislation.

§ The company discloses inside information and periodic reports to the public in accordance with legal requirements.

§ Public disclosure processes are updated in accordance with the regulations set by the CMB and relevant authorities.

§ Information that must be disclosed to the public must remain confidential until disclosed and must not be shared with third parties other than authorized persons.

§ Authorized managers and relevant units are responsible for preventing the sharing of inside information with unauthorized persons.

§ Persons with access to inside information are identified and recorded in accordance with the regulations determined by the CMB.

§ In the event of extraordinary circumstances, crises, or sudden changes in market conditions, a rapid and effective communication strategy is implemented to inform investors and stakeholders.

§ Incorrect information or rumors about the company that arise in the market are corrected through the Public Disclosure Platform (KAP) and official channels, if deemed necessary under SPK regulations.

§ It is essential that important developments such as financial results, investment plans, and operational changes are announced in a clear and explanatory manner to prevent speculative interpretations.

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5. General Communication Rules

Galata Wind Enerji A.Ş., as a publicly traded company, manages its information and public disclosure processes in accordance with the highest principles of transparency, accountability, and accuracy. The company fully complies with Borsa Istanbul (BIST) and Capital Markets Board (CMB) regulations and also aims to comply with the European Union's Market Abuse Regulation (MAR) and other international regulations in line with its investment plans in the EU.

This policy sets out the fundamental principles that frame all of Galata Wind's public communication and corporate disclosure processes. Specific procedures for implementing the policy are developed by the relevant units and published on the company's intranet system with reference to this policy.

6. Implementation of the Policy and Related Procedures

Galata Wind Enerji A.Ş. implements established procedures to manage its disclosure and public statement processes effectively and reliably. The company adopts the following practices to transparently share its financial and sustainability performance, operational processes, and strategic developments with stakeholders:

6.1. Management of the Disclosure Process

Galata Wind's disclosure and public reporting processes are carried out in accordance with this policy, approved by the Board of Directors, and established corporate principles. These processes are implemented in full compliance with relevant national and international legislation, the requirements of the European Union Corporate Sustainability Reporting Directive (CSRD), and the regulations of the Capital Markets Board (CMB).

All of the Company's disclosure processes are coordinated by the Corporate Communications, Investor Relations, and Sustainability Units. These units are responsible for ensuring the accuracy and integrity of the information to be disclosed. No statements may be made on behalf of and/or in reference to Galata Wind by any person or unit other than those authorized to do so.

Presentations made to capital market participants at investor information meetings or press conferences, disclosed reports, and/or information notes, in whole or in summary, may be published on the Company's corporate website after the presentation, teleconference, or meeting, subject to the Company's decision.

6.2. Authorized Disclosure Channels and Tools

Galata Wind conducts its public disclosure and information processes for its stakeholders through its own official and reliable communication channels:

Public Disclosure Platform (KAP): All important announcements related to capital markets are disclosed to the public through KAP.

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Corporate Website: Financial reports, sustainability reports, and company policies are regularly updated.

Investor Relations Meetings: Regular information meetings are held with stakeholders.

Press Releases: Media information processes are managed for strategic decisions and significant operational changes.

Corporate Accounts on Social Media and Digital Platforms: These are managed by the corporate communications unit, and only content authorized by the company is shared.

6.3. Financial and Sustainability Reporting

The company regularly publishes reports on its financial and sustainability performance in line with the principle of transparency. These reports include:

Annual and Interim Financial Reports: Published in accordance with the Capital Markets Board (CMB) and international accounting standards.

Sustainability Reports: Prepared in accordance with the CSRD and Turkish Sustainability Reporting Standards, covering Environmental, Social, and Governance (ESG) performance.

Carbon Emissions and Climate-Related Reporting: Emission data specific to the energy sector, renewable energy investments, and environmental impacts are shared regularly. These reports may be disclosed separately or as part of sustainability reports.

6.4. Insider Information Management and Public Disclosure

Galata Wind manages and publicly discloses insider information related to capital markets in accordance with the Capital Markets Board's (CMB) Special Situations Circular (II-15.1) and other national and international regulations. Persons with access to inside information are identified and recorded.

In accordance with the company's "quiet period" policy, no financial forecasts or strategic statements are made by company officials for a certain period of time before the financial results are announced.

In order to prevent asymmetric information distribution and unauthorized statements regarding operating results, financial results and other related matters are not discussed with capital market participants during specific periods called "silent periods."

For Galata Wind, the quiet period begins on the 15th of the month following the end of the quarterly and annual accounting periods and ends one business day after the date on which the financial reports are disclosed to the public.

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The Company and its personnel exercise the utmost care and diligence in ensuring the confidentiality of internal and ongoing information until it is disclosed to the public in accordance with the legislation. The principles to be considered in terms of measures to ensure confidentiality until the disclosure of special circumstances to the public are set out below:

- The Company fulfills its responsibilities regarding the creation and updating of the “list of persons with access to inside information” in relation to persons who are employed by the Company under an employment contract or in any other capacity and who have regular access to inside information.
- The company informs the persons included in this list of their obligations under the Capital Markets Legislation and the sanctions related to the misuse of this information.
- In order to prevent asymmetric information distribution and unauthorized disclosures regarding operating results, financial results and other related matters are not discussed with capital market participants during certain periods known as “quiet periods.”
- The Company may delay the disclosure of inside information to the public, provided that this does not harm its legitimate interests, does not mislead investors, and ensures that such information remains confidential. In such cases, the Company takes the necessary measures to ensure the confidentiality of inside information in accordance with Capital Markets Legislation.
- Awareness of the protection of inside information is raised by including information on this subject in the Company's “Ethical Rules and Working Principles” document.

6.5. Emergency and Crisis Communication

Galata Wind implements a rapid and effective communication strategy as quickly as possible to protect the Company's reputation and stakeholder confidence in the Company in the event of market rumors, crises, or emergencies.

Rapid Response Mechanism: In accordance with communication protocols and procedures established for emergencies, information is disclosed to the public with the approval of the board of directors.

Correction of Misleading Information: If false or misleading information about Galata Wind is disseminated in the market, corrective statements are made through KAP and official channels.

7. Language of Disclosure

Galata Wind uses Turkish and English for communication with its stakeholders and financial reporting. English has also been designated as the language used for the company's global operations. In addition, the company may publish press releases and other materials in different languages depending on the subject, target audience, or region of operation.

8. Management of Inside Information

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Galata Wind Enerji A.Ş.. manages inside information in accordance with capital markets legislation, Capital Markets Board (CMB) regulations, the European Union Market Abuse Regulation (MAR), and international best practices. The company takes the necessary measures to ensure the security of inside information, prevent unauthorized access, and maintain its reliability in the market.

The company implements controls to ensure that only authorized persons have access to inside information and protects the confidentiality of this information until it is disclosed to the public. The principles of transparency, equal access, and fair disclosure are fundamental to the disclosure of inside information. To ensure that all stakeholders have simultaneous and accurate access to information, inside information is disclosed through the Public Disclosure Platform (KAP) and other legal channels.

Galata Wind fully complies with all relevant regulations to prevent transactions based on inside information and to support the reliability of capital markets. Company management and individuals with access to inside information bear the necessary responsibilities for the protection and proper disclosure of inside information and comply with relevant legal regulations.

Confidentiality obligations are applied to prevent the sharing of inside information with unauthorized persons, and persons with access to inside information are regularly informed. In the event of false or misleading information about Galata Wind appearing in the market, the Company assumes the responsibility of informing the public accurately by making the necessary disclosures within the framework of the CMB and relevant legislation.

The Company monitors news and rumors about the Company in the press or other mass communication channels. If there are news and rumors with different content regarding information that is important enough to affect the value or price of the Company's capital market instruments or investors' investment decisions, which is disclosed to the public for the first time through the press or other communication channels or has been previously disclosed to the public; even if a decision has been made to delay the disclosure of inside information to the public, a public announcement is made regarding whether such information is accurate or sufficient.

If the news or rumor does not qualify as inside information, no announcement is made on the matter.

In this context, Galata Wind will continue to effectively manage inside information with a commitment to maintaining its credibility in the market and among investors.

The list of persons with administrative responsibility at the Company includes members of the Board of Directors, senior managers who have regular direct or indirect access to the Company's inside information and who also have the authority to make administrative decisions affecting the Company's future development and commercial objectives, and managers listed in the Company's signature circular.

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The Company and its employees exercise the utmost care and diligence in ensuring the confidentiality of inside and continuous information until it is disclosed to the public in accordance with the legislation.

The Company's assessments of its future plans and forecasts constituting inside information and the fundamental assumptions underlying these assessments may be disclosed to the public within the framework of the principles set out in the Capital Markets Legislation. Forward-looking assessments may be disclosed to the public subject to the written approval of the Board of Directors or the Chief Executive Officer (CEO) and Chief Financial Officer (CFO) authorized by the Board of Directors.

9. Policy-Related Procedures

The procedures implemented under Galata Wind's Disclosure and Public Statement Policy have been determined in line with the principles of transparency, accountability, and compliance. These procedures have been established to ensure the effectiveness of disclosure processes, to demonstrate full compliance with relevant legislation, and to set clear rules regarding the processes that must be managed when implementing the policy:

- ® Insider Information Management and Disclosure Procedure
- ® Emergency and Crisis Communication Procedure
- ® Public Disclosure Process and Approval Procedure
- ® Investor Relations and Stakeholder Disclosure Procedure
- ® Media and Digital Communication Management Procedure
- ® Disclosure Language and Translation Procedure
- ® Information Request Management Procedure
- ® Disciplinary Procedure (Common Procedure)

10. Compliance, Approval, and Review

Galata Wind's Disclosure and Public Statement Policy has been established to ensure that Galata Wind Enerji A.Ş. conducts its activities in accordance with the principles of transparency, accountability, and compliance with regulatory laws and regulations. The following processes are implemented for the policy's entry into force, implementation, and development:

10.1. Compliance and Legal Framework

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- The policy is implemented in full compliance with Capital Markets Board (CMB) regulations, the European Union Corporate Sustainability Reporting Directive (CSRD), Borsa Istanbul legislation, and national/international best practices.
- All of the company's disclosure and public statement processes are designed to comply with relevant regulations and are updated in line with regulatory changes or new regulations.
- Issues such as internal information management, crisis communication, and investor relations are managed in accordance with the legal framework, and cooperation with relevant institutions is carried out when necessary.

10.2. Approval and Implementation

- This policy enters into force upon approval by the Board of Directors of Galata Wind Enerji A.Ş..
- The Corporate Communications, Investor Relations, and Sustainability units are responsible for the implementation and continuity of the policy.
- All relevant departments must act in accordance with this policy, and employees must be regularly informed.
- The company's investors, stakeholders, and the public may provide feedback on the effectiveness of the information processes, and this feedback is regularly evaluated and submitted to the Corporate Governance Committee.

10.3. Review and Update

- The policy is regularly reviewed and updated. The policy may need to be revised based on changes in laws and regulations, market conditions, or corporate strategies. The update process is carried out with the recommendations of the relevant units and the approval of the Board of Directors. Internal audits are conducted to evaluate the effectiveness of the policy, and corrective measures are taken when necessary.

10.4. Non-compliance and Sanctions

- In case of violation of the policy, sanctions are applied in accordance with relevant legislation and company internal regulations.
- In cases such as unauthorized sharing of internal information, misinformation, or incomplete or delayed disclosure of information that should be made public, the relevant departments and managers are held responsible.
- Disciplinary procedures may be applied to employees who act contrary to compliance processes, and legal authorities may be consulted if necessary.

This Policy has been approved by the Galata Wind Energy A.Ş. Board of Directors decision dated 12.12.2025 and numbered 2025/28. With the entry into force of this Policy, previously published policies shall cease to be in force.

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1 The term “Capital Markets Board (CMB) regulations” refers to the Capital Markets Law No. 6362, the “Special Circumstances Disclosure Regulation (II-15.1)”, the “Corporate Governance Communiqué (II-17.1)”, regulations related to financial reporting, and all secondary legislation issued or updated by the Board. References to CMB regulations in this Policy refer to the framework for fulfilling public disclosure obligations under the aforementioned regulations.

2 The term “capital markets legislation” refers to the Capital Markets Law and all secondary regulations published by the CMB, as well as the rules established by Borsa İstanbul A.Ş. regarding public disclosure.