



# Dođan Őirketler Grubu Holding A.Ő.

## Disclosure Policy

Dođan Őirketler Grubu Holding A.Ő. (Company) “*Disclosure Policy*” sets forth the general procedures and principles for disclosing information, excluding trade secrets, to shareholders, stakeholders, and capital market professionals (collectively “*capital market participants*”) through various methods and channels.

The Company’s “*Disclosure Policy*” is designed, **in principle**, to provide capital market participants with timely, complete, equitable, understandable, and accurate information, and to ensure open, sufficient, and active communication between the Company and these participants.

In disclosing information to capital market participants, the Company complies with applicable legislation on public disclosure, primarily the Capital Markets legislation and the Turkish Commercial Code, along with Borsa İstanbul and Central Registry Agency regulations, as a general rule.

Information requests submitted by capital market participants are addressed by the Company’s Investor Relations Department in writing, by email, verbally, or through briefings, within the framework of publicly available information.

Full versions or summaries of presentations, disclosed reports, and/or information notes shared with capital market participants during **investor meetings or press conferences** may be published on the Company’s corporate website after the conclusion of the relevant presentation, teleconference, interview, meeting, or speech, depending on the Company’s decision.

The Company monitors news and rumors about itself in the press, media, and other mass communication channels. The principles that may be considered when evaluating **whether a public statement should be issued in response to such news or rumors** are outlined below:

- If news or rumors about the Company, which may affect the value or price of its capital market instruments or influence investors’ decisions, are made public for the first time through the press, media, or other communication channels; and if they differ in content from previously disclosed information, a public statement is issued confirming whether these claims are accurate or adequate, even if a decision had previously been made to delay the disclosure of inside information.
  - If the news or rumor does not qualify as inside information, no public statement is issued.
  - If a public statement has already been made regarding news or rumors that qualify as inside information, no further statement is issued.
  - Remarks, analyses, evaluations, and estimates about the Company that are based on already publicly available information are not addressed separately.
  - When assessing whether to issue a public statement, the reach and visibility of the press, media outlets, or other mass communication channels in which the news or rumor appears are also taken into account.



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The Company's list of "*individuals with administrative responsibility*" includes members of the Board of Directors, senior executives who have regular, direct or indirect access to the Company's inside information and who also have the authority to make administrative decisions that affect the Company's future development and commercial objectives, as well as managers listed in the Company's circular of signatures.

The Company and its employees exercise the utmost care and diligence to maintain the confidentiality of inside and continuous information until it is disclosed to the public in accordance with applicable legislation. The following principles may be taken into consideration when implementing **measures to ensure the confidentiality of material events until public disclosure**:

- The Company fulfills its obligations to create and maintain an up-to-date "*list of individuals with access to inside information*," which includes individuals who are either employees or contractually engaged and who have regular access to such information.
- The Company provides the necessary information to ensure that the individuals on this list are fully informed of their obligations under the Capital Markets legislation and the sanctions applicable to the misuse of inside information.
- To prevent the asymmetric distribution of information and unauthorized disclosure of operational results, the Company implements "quiet periods" during which discussions of financial results and related matters with capital market participants are prohibited.
- In order to protect its legitimate interests, the Company may postpone the public disclosure of inside information, provided that such postponement does not mislead investors and that the confidentiality of the information can be preserved. In these instances, the Company takes all necessary measures to maintain confidentiality in accordance with Capital Markets legislation.
- Measures to protect inside information are also addressed in the Company's "*Code of Ethics and Business Conduct*," thereby promoting broader organizational awareness.

The Company's forward-looking statements, including future plans and projections that constitute inside information, as well as the assumptions underlying such assessments, may be disclosed to the public in accordance with the principles set forth in Capital Markets legislation. The following principles may be taken into consideration when disclosing forward-looking statements:

- Forward-looking statements may be disclosed to the public by decision of the Board of Directors or with the written approval of the Chief Executive Officer (CEO) and Chief Financial Officer (CFO), as authorized by the Board of Directors.
- Forward-looking statements are disclosed by Company management no more than four times per year.
- Such announcements may be made in the form of material event disclosures or through annual reports or investor presentations, provided they are also published on the Public Disclosure Platform (KAP). However, in the event of material changes to previously disclosed forward-looking statements, a new statement must be issued.
- If there are material discrepancies between previously disclosed information and actual results, the forward-looking statements must include the reasons for these differences. The revised forward-looking statements should be disclosed through the same channels as the original announcements.