

ÜNLÜ YATIRIM HOLDİNG ANONİM ŞİRKETİ DISCLOSURE POLICY

I. Purpose and Scope

ÜNLÜ Yatırım Holding A.Ş. ("Company") ensures full and timely disclosure to the public in accordance with the provisions of the Capital Markets Legislation, Corporate Governance Principles, and the Company's Articles of Association within the framework of this Disclosure Policy.

The purpose of the Company's Disclosure Policy is to ensure active and transparent communication that is full, fair, accurate, timely, understandable, cost-efficient, and equally accessible to all stakeholders, including shareholders, investors, employees, and customers, in compliance with applicable regulations.

However, under these regulations, the Company may refrain from disclosing certain confidential or trade secret information to the public in cases where disclosure might harm its legitimate interests, provided such cases are within the principles set out in the legislation.

Additionally, the Company may defer the disclosure of insider information to the public to protect its legal rights and legitimate interests, provided that the deferral does not mislead the public and the confidentiality of the information can be maintained. Once the reasons for deferral cease to exist, the deferred insider information is disclosed to the public in accordance with the provisions of the Material Events Communiqué, including the reasons for the deferral.

Information disclosed to the public is made available on the Public Disclosure Platform (www.kap.org.tr) and the Company's corporate website in a timely, accurate, complete, understandable, interpretable, cost-efficient, and easily accessible manner to assist individuals and institutions in making informed decisions.

This Disclosure Policy applies to all employees of the Company.

II. Disclosure Methods and Tools

Without prejudice to the provisions of the Turkish Commercial Code, Capital Markets Law, and other relevant secondary regulations, the disclosure methods and tools used by the Company within the framework of this Disclosure Policy are as follows:

a. Material events disclosure made via the Public Disclosure Platform ("KAP") (www.kap.org.tr):

Material events disclosure regarding permanent and insider information required to be disclosed under the capital markets legislation are prepared by the Investor Relations Department in coordination with relevant units' recommendations and opinions and disclosed to the public via the KAP.

For issues requiring disclosure of material events under the capital markets legislation, media outlets, press conferences, press releases, or other communication channels may also be used. In such cases, a simultaneous or prior announcement is also made on the KAP, and the information is also published on the Company's corporate website.

b. Periodic disclosure of financial statements, independent audit reports, declarations, and annual and interim activity reports:

The Company's annual and interim consolidated financial statements and accompanying notes are prepared in accordance with the Turkish Commercial Code, the Capital Markets Law, and other secondary legislation. These financial statements are compliant with Turkish Accounting Standards and Turkish Financial Reporting Standards and are subject to independent audits as required by the applicable regulations.

Before the financial statements and their accompanying notes are disclosed to the public, they are submitted to the Board of Directors for approval along with the compliance opinion obtained from the Audit Committee, in accordance with the Capital Markets legislation. Following the Board of Directors' approval, a responsibility statement is signed by the Audit Committee members responsible for financial reporting, along with the Chairman of the Board/CEO or the Vice Chairman of the Board and the Chief Financial Officer. The financial statements, notes, and independent audit report, as required by the legislation, are then electronically submitted to the Public Disclosure Platform (KAP). Publicly disclosed activity reports are made available under a dedicated section on the Company's corporate website no later than the next business day following the disclosure. These reports remain accessible on the website for five years in a retrospective manner.

Information that shareholders may require regarding the financial statements and their accompanying notes is published on the Company's corporate website and is updated regularly.

c. Corporate Website (www.unluco.com):

The following key topics can be found on the Company's corporate website:

- Detailed information on corporate identity
- Vision and values
- Information on the Board of Directors and senior management
- Committees and their working principles
- Organization and shareholding structure of the Company
- Articles of Association
- Trade registry details
- Annual and interim financial statements, independent audit reports, and activity reports
- Press releases
- Material events disclosures
- General Assembly meeting invitations, agenda, and information documents
- General Assembly meeting minutes and attendee lists
- Proxy statement templates
- Corporate governance practices and compliance reports
- Policies
- Frequently asked questions
- Ethical rules

d. Announcements and notifications made via the Turkish Trade Registry Gazette:

Announcements that are legally required to be published in the Turkish Trade Registry Gazette under the Turkish Commercial Code and capital markets legislation are made within the timeframes stipulated by the relevant regulations. In accordance with capital markets legislation, announcements for General Assembly meetings are made at least three weeks prior to the meeting date (excluding the announcement and meeting dates) in a manner that ensures the broadest possible reach of shareholders, including publication on the Company's website.

Documents such as the financial reports, annual activity reports, profit distribution proposals, General Assembly agenda items, information documents prepared for these agenda items, and any other supporting documents, including amendments to the Articles of Association and their justifications, are made available for review at the Company's headquarters and on its website from the date of the announcement inviting shareholders to the General Assembly Meeting. These documents are presented in a manner that is easily accessible for shareholders. The agenda items for the General Assembly are expressed clearly and in a way that avoids ambiguity or misinterpretation.

e. Informative meetings and presentations held with investors and analysts, either face-to-face or via teleconferences:

To effectively communicate the Company's operational and financial performance, as well as its vision, strategy, and goals, senior executives and the Investor Relations Department periodically meet with analysts and investors. These meetings may also include participation in national and international conferences or meetings to share information. Presentations, Q&A sessions, and summary information prepared for these purposes may be published on the Company's website to enhance its representation. All meeting requests from shareholders are addressed, and opportunities for the highest level of engagement are provided whenever possible. Following the disclosure of financial statement results or significant material events, teleconferences may be organized, investor presentations may be conducted, and the information may also be shared with the public through the corporate website.

For the public disclosure of matters, including forward-looking assessments, media outlets, press conferences, and/or press releases, as well as other communication channels, may be utilized. These announcements are also disclosed via the Public Disclosure Platform (KAP) prior to or simultaneously with other forms of communication and are additionally published on the Company's website.

f. Communication tools such as telephone, email, fax, etc.:

Information requests submitted to the Company by shareholders and investors in writing are responded to by the Investor Relations Department in accordance with publicly disclosed information and the principles of accuracy, completeness, and equality, generally in written form, although brief and concrete questions may also be answered verbally when necessary.

III. Principles for Disclosures of Forward-Looking Assessments

Forward-looking assessments that include plans and forecasts considered insider information or provide investors with insights into the issuer's future activities, financial condition, or

performance may be disclosed to the public within the framework of capital markets legislation. These disclosures may be made at most four times per year, following the release of quarterly financial statements, subject to approval by the Chairman of the Board authorized by a Board resolution.

Forward-looking assessments may include, but are not limited to, expected market developments, revenue and volume growth forecasts, profitability ratios, investment plans, and new product projections, provided they comply with confidentiality, Company interests, and contractual and regulatory constraints.

Such disclosures are based on reasonable assumptions and estimates and must not include baseless, exaggerated, or misleading predictions.

If unforeseen risks and developments result in deviations, or if previously disclosed assessments significantly differ from actual outcomes, or it becomes evident that such assessments will not materialize, an announcement must be made to the public, explaining the reasons for these deviations.

IV. Monitoring News and Rumors About the Company in the Media and on Websites and Principles for Related Disclosures

The Company monitors news and rumors in the media and other communication channels as needed, using conventional and social media tracking tools it has contracted domestically and through its own internal resources. If there are reports or rumors containing information that has been disclosed to the public for the first time or differs from previously disclosed information, the Company evaluates their potential impact on the value, price, or investment decisions related to the Company's shares. If deemed necessary, even if a deferral decision has been made, the Company promptly makes a public disclosure in accordance with the principles outlined in capital markets legislation, addressing whether the information is accurate or sufficient.

For news and rumors in the media that do not necessitate a material events disclosure, the Company may, at its discretion, choose to make a statement. If the reported information does not meet the definition of insider information, the Company typically refrains from making any statement. However, the necessity and benefit of making a statement regarding such news are evaluated by the Chairman of the Board/CEO in coordination with the Investor Relations Department. Any statements made may be communicated to the public in writing or verbally via press outlets or published on the Company's website (www.unluco.com).

As a principle, the Company does not comment on rumors, gossip, or clearly false reports not originating from the Company itself. However, if deemed necessary to protect the interests of the Company and its investors, the Company may issue a statement even for such baseless reports.

The Company is not obligated to provide public comments on evaluations, analyses, interpretations, social media posts, or forecasts based on publicly disclosed information communicated through media outlets or other communication channels regarding the adequacy or accuracy of such evaluations.

V. Authorized Persons for Public Disclosures

Statements made on behalf of the Company through written and visual media or data distribution channels are coordinated by the Corporate Communications and Marketing Department and are issued with the approval of either the Chairman or Vice Chairman of the Board of Directors.

The Investor Relations Department, in particular, is responsible for promoting the Company to existing and potential investors and financial institutions both domestically and internationally. This includes responding to information requests from analysts and research specialists at these institutions and addressing questions received within the scope of investor relations. When necessary, the department coordinates with relevant Company units based on the content of the request to communicate on behalf of the Company.

It is essential that all statements made by authorized individuals on behalf of the Company are subject to prior evaluation and review by the Investor Relations Department, in collaboration with relevant Company units.

VI. Deferral of Public Disclosure of Insider Information

Within the framework of the Capital Markets Board's public disclosure regulations, it may be deemed necessary to exercise the authority to defer the public disclosure of insider information that, although considered significant enough to affect the value, price, or investment decisions related to the Company's capital market instruments, could harm the legitimate interests of the Company if disclosed, provided that investors' interests are not overlooked.

The public disclosure of insider information can be deferred by a decision of the Board of Directors. The deferral decision must include details on the insider information being deferred, the impact of the deferral on protecting the Company's legitimate interests, confirmation that the deferral does not pose a risk of misleading investors, and the measures taken to maintain the confidentiality of the information during the deferral period.

If, despite the confidentiality measures taken, the insider information subject to deferral is disclosed to the public by another real or legal person domestically or internationally, or due to the fault of individuals obligated to maintain its confidentiality, the conditions for deferral are considered to have been nullified, and immediate public disclosure is made.

During the deferral period, statements that conflict with the deferred information are avoided. Once the reasons for deferral cease to exist, the Company discloses the deferred insider information on the Public Disclosure Platform (KAP), including the reasons for the deferral decision.

If the event related to the deferred insider information does not occur, no further disclosure is required.

In the case of news or rumors related to deferred insider information, an evaluation is made regarding whether confidentiality has been maintained, considering factors such as the circulation or credibility of the media outlet where the news was published. If it is concluded that confidentiality has not been maintained, an immediate material events disclosure is made.

The decision to continue with the deferral remains the responsibility of the Board of Directors that issued the deferral decision.

VII. Measures Taken to Ensure Confidentiality Until the Public Disclosure of Material Events

a. Company Information / Insider Information

Insider information refers to information, events, or developments related to a specific situation that has not been disclosed to the public and could provide an advantage to the person utilizing it compared to other investors who are unaware of such information. Such information is considered significant by a rational investor in making an investment decision and, if disclosed to the public, could influence the value or price of the capital market instrument or the investment decisions of investors.

The Company is obligated to make a material events disclosure under the Capital Markets Board's public disclosure regulations whenever insider information or changes to previously disclosed information arise or are discovered.

The Company places great importance on ensuring that all employees comply with rules related to the use of insider information to maintain the balance between transparency and protecting the Company's interests. All necessary measures are taken to prevent the misuse of insider information.

As a general principle, the Company and its employees acting on behalf of the Company are strictly prohibited from sharing any undisclosed information, which may be classified as a material event, with third parties. Information learned during employment that pertains to the Company and is considered confidential or a trade secret, as deemed by Company authorities, is treated as "Insider Information." All employees are required to safeguard Company information both during their employment and after leaving the Company, ensuring that they neither directly nor indirectly use such information.

b. Procedure for Public Disclosure of Material Events

Material events disclosures regarding continuous and insider information that must be disclosed under the Capital Markets Board's Material Events Communiqué are prepared by the Investor Relations Department in coordination with relevant units' recommendations and opinions. These disclosures are, in principle, signed by any two of the following authorized individuals: the Chairman or Vice Chairman of the Board of Directors, the Chief Financial Officer, the Investor Relations Department Manager, the Finance Director, or a Finance Specialist. The disclosures are then submitted to the Public Disclosure Platform (KAP) electronically in compliance with the provisions of the Communiqué.

Material events disclosures are transmitted to the KAP within the timeframes stipulated by legislation and are published under a separate section of the Company's website dedicated to investor relations no later than the next business day following the disclosure. These disclosures remain accessible under the investor relations section of the Company's website for five years.

Employees with access to insider information, as well as other parties in close communication with them, are informed in writing and required to acknowledge their obligations regarding insider information as set out in the relevant laws and regulations. This includes acknowledgment of the penalties for the misuse or dissemination of insider information.

The Company provides ongoing training, including in-service and orientation programs, to inform its executives and employees about the obligations regarding insider information and the consequences of misuse or dissemination. These matters are also addressed in the ÜNLÜ & Co Code of Ethics and Conduct. Reports regarding issues outlined in the regulations are evaluated within the framework of the ÜNLÜ & Co Code of Ethics and Conduct.

Measures are taken, such as obtaining confidentiality agreements and implementing similar methods, to prevent access to insider information by employees not listed among those with access or by third parties providing services to the Company.

In the event of inadvertent disclosure of insider information to third parties ("unauthorized disclosure"), the Company assesses whether confidentiality can still be maintained. If confidentiality cannot be ensured, a material events disclosure is made immediately in compliance with capital markets regulations.

The Company may defer the public disclosure of insider information to protect its legitimate interests, provided that this does not mislead investors and confidentiality is maintained. In such cases, the Company takes all necessary measures to ensure the confidentiality of the insider information in compliance with the provisions of the capital markets legislation.

If a deferral decision is made, a list of individuals with access to the deferred information is created or updated as part of the "List of Individuals with Access to Insider Information." Necessary actions are taken to inform these individuals and others who may have access to the information, and appropriate measures are implemented to ensure confidentiality.

No Company employee may engage in activities that generate profits from the trading of the Company's shares based on insider information obtained through their role.

c. Blackout Periods

Company executives, as well as their spouses, children, or individuals living in the same household, are prohibited from trading in the Company's shares or securities based on such shares during the period ("**Blackout Period**") starting from the day following the end of the accounting period in which **semi-annual and annual** financial statements and independent audit reports are prepared and lasting until these statements and reports are disclosed to the public in compliance with the applicable legislation.

This prohibition also applies to the executives of the Company's subsidiaries and parent companies, as well as individuals who, due to their shareholding in the Company or its subsidiaries and parent companies, possess insider information or continuous information.

VIII. Principles for Identifying Individuals with Administrative Responsibility

Within the framework of the Capital Markets Legislation, "Individuals with Administrative Responsibility" are defined as members of the Board of Directors or individuals who, despite

not being Board members, have regular direct or indirect access to the Company's insider information and possess the authority to make administrative decisions that impact the Company's future development and commercial objectives.

At our Company, Individuals with Administrative Responsibility include members of the Board of Directors, committee members reporting to the Board, executive committee members, and individuals holding "A" group and "B" group signing authority in the Company's signature circular. The list prepared based on these criteria is shared with the Central Registry Agency (CRA or MKK) in compliance with the provisions of the capital markets legislation.

In accordance with the provisions of the Material Events Communiqué, the Company informs Individuals with Administrative Responsibility in writing about their obligation to report all transactions carried out by them or their closely associated persons involving shares representing the Company's capital and other capital market instruments based on such shares to the relevant stock exchange. The definitions provided in the Material Events Communiqué are taken into consideration when identifying Individuals with Administrative Responsibility and their closely associated persons.

The Board of Directors is responsible for the implementation, development, and monitoring of this Disclosure Policy.

Any questions regarding the implementation principles and procedures of this policy should be directed to the Investor Relations Department.