



# Doğan Şirketler Grubu Holding A.Ş.

## Disclosure Policy

The "Disclosure Policy" of Doğan Şirketler Grubu Holding A.Ş. (the Company) regulates the general procedures and principles for sharing information with shareholders, stakeholders, and capital market professionals (collectively "capital market participants") through various tools and methods, except for information that qualifies as a commercial secret.

With the "Disclosure Policy," the Company aims to ensure that capital market participants are informed in a timely, complete, equal, understandable, and accurate manner, and that an open, adequate, and active communication is maintained between the Company and these participants.

As a general rule, the Company adheres to the relevant regulations regarding public disclosure, primarily the Capital Markets Legislation, the Turkish Commercial Code, and the regulations of Borsa İstanbul A.Ş. and the Central Registry Agency.

Requests for information from capital market participants are responded to by the Company's Investor Relations Department in writing, via email, verbally, or through informational meetings, based on information that has been previously disclosed to the public.

Presentations made to capital market participants during investor briefings or press conferences, reports disclosed, and/or information notes communicated may, at the Company's discretion, be published on the Company's corporate website after the conclusion of the presentation, teleconference, meeting, or speech.

The Company monitors news and rumors about itself in the media and other mass communication channels. The following principles are considered when evaluating whether to make a public statement about news or rumors:

- In the presence of news or rumors, which are significant enough to affect the value, price of capital market instruments, or the investment decisions of investors, and that differ from previously disclosed information, the Company will make a public statement regarding whether the information is correct or sufficient, even if a decision has been made to delay the public disclosure of inside information.
- If the news or rumor does not qualify as inside information, no statement will be made about it.
- If a statement has been made previously about news or rumors that qualify as inside information, no further statements will be made.
- Comments, analysis, assessments, and forecasts made about the Company based on publicly disclosed information will not be considered.
- In evaluating whether to make a statement, the circulation or popularity of the media outlet or mass communication channel in which the news or rumor was published will also be taken into account.



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The Company's list of "people with administrative responsibilities" includes the members of the Board of Directors and senior executives who have regular access to the Company's inside information directly or indirectly and have the authority to make administrative decisions that affect the Company's future development and business objectives, as well as managers listed in the Company's signature circular.

Maximum care and attention are given by the Company and its staff to maintain the confidentiality of inside and ongoing information until public disclosure is made in compliance with the regulations. The following principles are taken into consideration regarding measures to ensure confidentiality before the public disclosure of material events:

- The Company fulfills its responsibilities regarding the creation and updating of the "list of individuals with access to inside information" for individuals working under an employment contract or otherwise under the Company's control with regular access to inside information.
- The Company informs the individuals on this list about their obligations under the Capital Markets Legislation and the penalties related to the misuse of such information.
- To prevent asymmetric information distribution and unauthorized disclosures related to financial results, the Company avoids discussions of financial results and other related matters with capital market participants during certain periods called "quiet periods."
- The Company may delay the public disclosure of inside information to avoid harming its legitimate interests and to prevent misleading investors, provided that the information is kept confidential. In such cases, the Company will take the necessary measures under the Capital Markets Legislation to ensure the confidentiality of inside information.
- Information on protecting inside information is also included in the Company's "Code of Ethics and Working Principles" document to raise awareness.

The Company's evaluations regarding future plans and forecasts, which qualify as inside information, may be disclosed to the public in accordance with the principles specified in the Capital Markets Legislation. The following principles may be considered in disclosing future evaluations:

- Future evaluations may be disclosed to the public if they have been approved in writing by the Board of Directors or the CEO and CFO jointly authorized by the Board.
- Future evaluations are disclosed by the Company's management to the public up to four times per year.
- This disclosure may be made as a material event disclosure, or through reports or investor presentations published on the Public Disclosure Platform (KAP). However, if there is a significant change in previously disclosed future evaluations, an explanation must be made.
- In any disclosures related to future evaluations, if there is a significant discrepancy between the previously disclosed information and actual outcomes, the reasons for such differences are explained, and new evaluations are disclosed in the same platform where the previous evaluations were publicly disclosed.