

ODAŞ ELEKTRİK ÜRETİM SANAYİ TİCARET A.Ş.

Disclosure Policy



I. PURPOSE AND SCOPE

Odaş Elektrik Üretim Sanayi Ticaret A.Ş. (hereinafter “ODAŞ” or “Company”) regularly discloses information to the public in conformity with the regulations of the Capital Market Board (the “CMB”) and the Borsa Istanbul (“BİST”). The purpose of ODAŞ Disclosure Policy is to ensure an active and transparent communication which is complete, fair, correct, timely, clear, and cost-effectively and equally accessible for all stakeholders including shareholders, investors, employees and customers in accordance with the regulations to which the Company is subject. However, in accordance with

these regulations, the Company may choose to refrain from disclosing certain confidential information in circumstances in

which disclosure would be prejudicial to the Company’s interests.

II. AUTHORIZATION AND RESPONSIBILITIES

The Company’s Disclosure Policy is established and operated under the authority of the Company’s Board of Directors. The Board also reserves the authority to amend the Disclosure Policy from time to time, in accordance with applicable regulations. The Disclosure Policy and any amendments thereto are to be published on the web site of the Company following their approval of the Board of Directors.

The responsibility to maintain and monitor this Disclosure Policy is incumbent on the Company’s Investor Relations Department.

III. Disclosure Methods and Means

Disclosure methods and means utilized by our Company under this Disclosure Policy are as follows.

- **Statutory Corporate Public Disclosures**

For purposes of this Disclosure Policy, what we refer to as “Inside Information” is defined as information about the Company that has not been made public and which may affect the value of publicly-traded securities issued by the Company and the investment decisions of the investors holding or acquiring such securities.

As a general matter, it is the Company’s policy that Inside Information should be disclosed by the Company in accordance with the regulations of the CMB in a reasonable manner designed to be accessible to shareholders, investors, employees and customers, including through the web site of the Company.

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www.odas.com.tr

In cases in which public disclosure is required, such disclosure is to be made by the Investor Relations Department.



- **Disclosure of Financial Reports**

ODAŞ prepares its interim and annual financial statements in accordance with the regulations of the CMB and international financial reporting standards (IFRS) published by the International Accounting Standards Board. Financial reports, including the Company's financial statements and Turkish interim activity reports prepared in accordance with CMB requirements, are made public in accordance with the relevant regulations. The Company also publishes annual reports in the form required by the CMB. These reports are also published on the web site of the Company.

- **Written and Verbal Information Requests, Press Releases, Disclosures to News Agencies, Disclosures Made in Conferences and Meetings**

Information requests communicated to the Company by shareholders, investors and analysts are handled by the Investor Relations Department, within the limits of publicly available information. For disclosure of the Company's operational results and other material developments, press conferences and/or press releases may also be utilized in addition to the public disclosures made to BIST. Press releases are also posted on the web site of the Company. The Company and its representatives may from time to time participate in national and international conferences or meetings held for the purpose of sharing information with investors and analysts. Presentations used in such meetings may be published on the web site of the Company.

- **Corporate Web Site**

The Company actively uses its web site (i.e. <https://www.odas.com.tr/>) for public disclosure which is designed to ensure easy access to publicly available information, both present and past. The Company's web site offers rich content, simplicity, timely and relevant information. It generally includes public disclosures, financial reports, annual reports, shareholder structure, corporate governance practices, Company mission and vision and the contact information of Investor Relations Department.

- **Disclosures Regarding General Assembly Meetings, Capital Increase and Dividend Distribution**

The Company makes disclosures regarding General Assembly Meetings, capital increases and dividend distribution in accordance with the local regulations to which it is subject as well as its Articles of Association.

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IV. FORWARD-LOOKING STATEMENTS

In cases deemed necessary or advisable, the Company's expectations and targets may be disclosed. The forward looking statements are based on reasonable assumptions and forecasts. These statements may be revised in case of deviations due to unforeseeable risks and developments.

V. FOLLOW-UP OF NEWS AND RUMORS ABOUT THE COMPANY

The Company may choose to comment on news and the rumors about the Company reported in the media and public disclosures may be made if deemed appropriate or necessary by the Company. The Company undertakes no duty to comment on news and rumors, but may choose to do so from time to time in accordance with this Policy.

The Company may want to comment on news and rumors reported in press that in situations in which the Company has no obligation to make public disclosure. These comments may be made through verbal or written communication with the press and/or the web site of our Company (<https://www.odas.com.tr/>).

VI. PROTECTION OF THE CONFIDENTIALITY OF INSIDE INFORMATION

Disclosure of Inside Information may be postponed in accordance with applicable regulation in order to prevent any damage to the legitimate interest of the Company in accordance with the "Inside Information Management Procedure" applied by the Company.

In such cases, the Company shall implement measures in order to ensure the confidentiality of inside information as defined in the regulations of the CMB and in accordance with the Inside Information Management Procedure, which is monitored by Investor Relations Department.

VII. PERSONS HAVING EXECUTIVE RESPONSIBILITY

The Persons having Executive Responsibility are defined as the members of the Company's managing and auditing bodies as well as the persons having regular access to the inside information related to the Company directly or indirectly and authority to adopt executive decisions affecting future development and business objectives of the Company.

The Persons having Executive Responsibility in our Company have been determined as the Members of the Board of Directors and Managers.



VIII. YÜRÜRLÜK VE GÖZDEN GEÇİRME

The Disclosure Policy shall enter into force with the Board of Directors' Resolution No. 2013/34 of December 30, 2013 posted on Company's website. The changes to these shall be subject to the decision of the Board of Directors.