

## **DISCLOSURE POLICY**

### **Purpose**

The purpose of this Disclosure Policy, created by the Board of Directors of Doğuş Otomotiv Servis ve Ticaret A.Ş., is to provide shareholders and stakeholders with fair, timely, accurate, complete, understandable, interpretable, and easily accessible information about the developments other than trade secrets regarding the company's past performance and future expectations.

### **Authority and Responsibility**

This Disclosure Policy has been created by the Board of Directors within the framework of the regulations of the Turkish Commercial Code (TCC), Capital Markets Legislation, Capital Markets Board (CMB), and Borsa İstanbul (BIST) and based on the CMB Corporate Governance Principles. This Policy sets forth the principles for written and verbal communication with the employees, public authorities, customers, suppliers, creditors, investors, non-governmental organizations, those who wish to invest in the company, and shareholders.

Our company has designated the following personnel as those who are responsible for the notifications to be delivered in public disclosures and as authorized signatories. The same personnel are assigned to supervise and monitor all kinds of issues related to public disclosures:

Chief Financial Officer (CFO)

General Accounting Manager

Investor Relations Executive

CMB/IFRS Executive

and the persons to be appointed by the Chief Financial Officer (CFO)

Written information requests -excluding confidential information or trade secrets- from the shareholders or related parties shall be answered by the "Investor Relations Unit".

### **Methods and Tools Used in Public Disclosures**

The methods and tools used by the company in public disclosures in accordance with the provisions of the Capital Markets Legislation and the TCC are as follows:

- a. Disclosures of Material Information submitted to the Public Disclosure Platform (PDP) and other notifications.
- b. Announcements such as financial statements and footnotes, independent audit reports and annual reports, explanatory notes, circulars, General Assembly calls published

on the Turkish Trade Registry Gazette and daily newspapers, and announcements approved by the CMB,

- c. Meetings, teleconferences, or one-on-one meetings with the shareholders, investors, analysts, and capital market experts, and information and promotional documents,
- d. Disclosures to data distribution companies,
- e. Press releases delivered through written and visual media,
- f. Telephone, electronic mail (e-mail), fax, and other means of communication,
- g. Corporate website ([www.dogusotomotiv.com.tr](http://www.dogusotomotiv.com.tr))

## **Practices Regarding Disclosures of Material Information**

### **Disclosures of Material Information (includes other notifications delivered via the PDP)**

The Disclosures of Material Information containing continuous and internal information are disclosed to the public in Turkish and English and in accordance with the pertinent communiqués and regulations of the CMB. Disclosures of Material Information are submitted in a timely, accurate, comprehensible, and adequate manner, and free from any misleading statements to help the individuals and organizations will benefit from the disclosure in their decision-making. Such disclosures cannot be used for advertising, public relations, or marketing partnership activities or capital market instruments.

Disclosures of Material Information are sent to the Public Disclosure Platform using an electronic signature and in accordance with the relevant regulations of the BIST and the CMB, later to be published on the corporate website under a separate heading.

### **Persons Authorized to Disclose Material Information to the Public**

Relations with the shareholders in our company are carried out by the "Investor Relations Unit" under the General Directorate of Financial Affairs. Disclosures of Material Information are prepared within the General Directorate of Financial Affairs and the material information is disclosed to the public with the joint approval of at least two responsible personnel who are authorized signatories.

### **Postponement of Public Disclosure of Insider Information**

Doğuş Otomotiv Servis ve Ticaret A.Ş. may postpone the disclosure of insider information to the public to prevent damage to its legal rights and legitimate interests, if this does not mislead the public and that the company can ensure that this information is kept confidential. As soon as the reasons for postponing the public disclosure of the insider information are eliminated, the said insider information is disclosed to the public in accordance with the relevant regulations of the CMB, stating the reasons for the postponement decision.

If the company decides to postpone the public disclosure of insider information, the postponement depends on the decision of the Board of Directors or, if authorized by the Board of Directors, the decision of the authorized person if;

- The postponement has no effect on the protection of the legal rights of the partnership,
- The postponement does not pose the risk of misleading the investors,
- Measures have been taken to protect the confidentiality of this information during the postponement process.

## Measures Taken to Ensure Confidentiality of the Insider Information

A list of real or legal persons acting on behalf of the Company, who work for the Company by an employment contract or otherwise, and who have regular access to insider information is prepared, and this list is presented to the Central Securities Depository of Turkey (CSD). In case of a change in this information, the information is updated within the legal period. In line with these notifications, the list of people who have access to insider information is kept by the CSD and sent to the Capital Markets Board or BIST upon request. It is ensured that the persons included in this list accept the obligations in the law and relevant legislation regarding this information and are aware of the sanctions regarding the misuse or improper distribution of this information. The disclosure of insider information by those who have access to it, during the performance of our company's duties or while carrying out businesses and transactions on behalf of the company, to persons inside and outside the company -except for those who are obliged to keep the information confidential- is considered unauthorized disclosure of the insider information. In this case, all the information contained in the unauthorized disclosure is disclosed to the public by the persons authorized by our company through a disclosure of material information.

The disclosure of insider information to lawyers, independent auditors, tax advisors, credit institutions, financial service providers, rating agencies, etc., who are subject to confidentiality rules, does not qualify as unauthorized disclosure of the insider information, provided that such persons need this information when performing their duties. For such qualification, the person to whom the information will be disclosed must be under the obligation to keep the information confidential by means of a legal regulation Articles of Association, or a special agreement.

In statements made to a limited number of people, such as press conferences, publicity meetings, and investor disclosure meetings, the disclosures are delivered to the public instantaneously, if they are made deliberately, or without delay in other cases.

In case of an unintentional disclosure of insider information, a disclosure is made without delay. The company employees are informed in accordance with the regulations of the CMB that they must not share any inside information with third parties, while all employees should strive and act responsibly to ensure confidentiality. On the other hand, necessary measures are taken to ensure that the employees have access to information limited to their job descriptions.

In certain periods of the calendar year, the "Forbidden Period" practices, in which none of the employees in our Company may buy or sell Doğuş Otomotiv shares, are put into effect. The Forbidden Period has been defined as the period to be determined and announced by the senior management of the company within the scope of the relevant legislation, from the day

following the end of the accounting period to which the financial statements belong until their disclosure to the public in accordance with the legislation.

## **Disclosures about News and Rumors**

In case company news and rumors that may affect the investment decisions of investors and the value of capital market instruments, originate from persons who are not authorized to represent the company, and have a different content than the information previously disclosed to the public may appear in the media, a statement/disclosure of material information in accordance with the pertinent communiqués of the CMB is made to confirm whether these news and rumors are true and sufficient. It is ensured that a press release is delivered to various media organs and data distribution channels such as Reuters and that it is published on the corporate website. In the event that the news or rumors in question are related to information whose disclosure has been postponed, it will be assumed that the reasons necessitating the postponement are no longer valid, and a public disclosure is made. The same method is followed in cases that are published in the media but do not create an obligation for disclosure of material information under the CMB Legislation but are deemed appropriate by the company's senior management to deliver a statement regarding the said news and rumors.

## **Use of Partnership Rights**

The finalization of the following issues regarding the use of partnership rights depends on the decision of the Board of Directors of the Company. If the Board of Directors decides on the following issues, these issues are disclosed to the public by delivering a disclosure of material information and publishing them on the corporate website, in the Turkish Trade Registry Gazette, and on other channels required by the relevant legislation.

- a. Meeting date, time, place, and agenda items of the General Assembly, attendance procedure in the General Assembly, obligations to be fulfilled by those who want to attend the General Assembly or vote by proxy, the matters that are not on the agenda but are to be discussed and resolved at the General Assembly, failure to convene the General Assembly, information on the total number of shares and total voting rights, and how the right to attend the General Assembly can be exercised.
- b. Announcements regarding profit distribution, issuance of new shares, allocations for capital increases, use of the right to buy new shares, cancellation of increased shares, mergers, and demergers.

## **Disclosure of the Financial Statements to the Public**

Our company's financial statements are prepared on a consolidated basis and in accordance with CMB's Financial Reporting Standards. Financial statements and footnotes are presented in accordance with the formats determined by the CMB and include the mandatory information.

The financial statements are approved by the Board of Directors after taking the opinion of the Audit Committee and are announced to the public via the Public Disclosure Platform (PDP), together with a statement of responsibility prepared in accordance with the CMB regulations, bearing the joint signatures of one of the members of the Board of Directors responsible for the preparation of the financial statements and one of the responsible managers, or two assigned

responsible managers. The financial statements are disclosed to the public within the periods determined by the CMB.

The financial statements are published on the corporate website of our company in a way that users can easily access, no later than one business day after they are announced to the public. Other financial statements prepared by the company to be submitted to any authority in accordance with the legal regulations are announced to the public simultaneously with the relevant institutions via the Public Disclosure Platform (PDP). During the preparation of the financial statements, utmost care is taken to protect the confidentiality of the information used in the preparation and control of these statements and the draft financial statements.

## **Disclosure of the Annual Report to the Public**

Our Company's Annual Report is prepared in accordance with the Capital Markets Legislation and CMB Corporate Governance Principles, approved by the Board of Directors, and announced to the public on the Public Disclosure Platform (PDP) together with the financial statements.

The Annual Report is prepared in Turkish and English and disclosed to the public on our corporate website. Capital market participants, should they wish, can obtain the Turkish and/or English versions of the annual reports from the Investor Relations Unit.

## **Disclosure of Future Assessments**

Doğuş Otomotiv Servis ve Ticaret A.Ş. may disclose its future assessments at most four (4) times a year in accordance with its Disclosure Policy. The written documents, in which the assessments of our company are disclosed, will explicitly indicate all possible risks and uncertainties as well as other factors, and state that the actual results may be partially or substantially different from all or any part of the expectations. Future assessments may be disclosed to the public, if they are subject to the decision of the Board of Directors, or the written approval of the person authorized by the Board of Directors.

The assessments do not contain exaggerated, groundless predictions, are not misleading, and are to be prepared in a way that can be associated with the financial position and operating results of the company.

In the event that the estimations and the bases included in the periodic financial statements and reports are not or will not be realized, the revised information, tables, and reports are immediately disclosed to the public, along with the reasons for failure.

## **Communication with the Shareholders and Stakeholders**

It is the responsibility of the Investor Relations Unit to maintain regular relations with the shareholders. The Investor Relations Unit shares all kinds of information about the company that has been previously disclosed to the public with all shareholders, treating them equally.

The persons who are authorized within the scope of the disclosure policy may communicate with the shareholders and stakeholders. No other employees are allowed to respond to questions and information requests from outside the Company.

The employees in the Investor Relations Unit may not guide the interim and annual activity results in meetings and briefings with the shareholders and stakeholders. However, they may convey to capital market participants the critical issues affecting the operating results, their strategic approaches, and significant issues that may help the participants better understand the sector and the environment in which the Company operates.

Presentations, information meetings, press conferences, teleconferences, and one-on-one meetings are announced to the public in advance as much as possible. The presentations and/or explanatory notes prepared for these meetings are published on the company's website simultaneously with these meetings, to ensure that all shareholders have access to the relevant documents at the same time.

The press conferences are held, and releases are delivered by the executives who are authorized to make statements on behalf of the company.

Our company does not confirm, attest or take responsibility for the analyst reports or income models prepared about it. Nevertheless, the analyst reports may be reviewed in certain and limited situations and upon request, to prevent misinformation of the public, provided that only the publicly disclosed and retrospective historical information is used and the review is limited to a specific subject. Provided that the permissions of the analysts who prepare a report about our company are obtained, their names-surnames, e-mail addresses, and information regarding their affiliations can be disclosed to the public on the corporate website.

## **Corporate Website and Its Content**

Our company's website, [www.dogusotomotiv.com.tr](http://www.dogusotomotiv.com.tr), has been prepared in Turkish and English and within the scope of the Corporate Governance Principles. The information on our website consists of the main headings "About Us, Sustainability, Investor Relations, Career, Press and Communication" and has been designed in a fashion that all stakeholders can benefit from it. Improvements regarding our corporate website are carried out when necessary. The security of the information published on our company's website is provided by the Central Securities Depository of Turkey and the company from which the Company procures Information Technologies services.

## **Persons with Administrative Responsibilities**

The persons who have administrative responsibilities in accordance with the Capital Markets Legislation are:

- Members of the partnership, members of the management or auditing bodies.
- Persons who, although not members of these bodies, have regular access to insider information related to the partnership, directly or indirectly, and are authorized to make administrative decisions that affect the future development and commercial objectives of this partnership.

The transactions carried out by the persons who have administrative responsibility within the partnership regarding the shares representing the company's capital and other capital market

instruments based on these shares and the persons closely related to them and the transactions carried out by the main partner of the company are notified to the relevant exchange market by the person that performs the transaction.

## **Enforcement**

This Disclosure Policy shall enter into force upon the approval of the Board of Directors. In case the disclosure policy requires an amendment, the amendments and the reasons for the amendments are disclosed to the public following the approval of the Board of Directors.