



disclosure policy

**KUZEYBORU®**

# 1. PURPOSE, SCOPE AND BASIS

Kuzey Boru A.Ş. The main purpose of the (Company) Disclosure Policy is to provide financial and non-financial information and developments regarding our Company's past performance and future performance expectations, which may affect investment decisions and are not trade secrets, to the extent of the possibilities of the sector conditions in which our Company operates, relevant legislation, domestic/foreign shareholders, potential investors. Ensure that it is presented equally, fairly, accurately, and in a timely and understandable

manner to all stakeholders such as employees, customers, and relevant authorized institutions.

Kuzey Boru A.Ş. Disclosure Policy; It is carried out by taking into account the issues covered by the Capital Markets Legislation, Capital Markets Decisions, Corporate Governance Principles, the provisions of the Company's articles of association and other relevant legislation, and the issues requested to be disclosed within this framework are announced to the public in a timely, complete and accurate manner. The Disclosure Policy covers all employees working within the Company.

# 2. AUTHORITY AND RESPONSIBILITY

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The Board of Directors is responsible for creating, monitoring, developing and updating our Company's Disclosure Policy when necessary. The Board approves the Disclosure Policy and any changes to be made in the policy of Directors, announced to the public on our Company's website, and presented to the information of the partners at the first General Assembly meeting

The implementation and development of our Company's disclosure policy is under the authority and responsibility of the Board of Directors. The Investor Relations Department is responsible for implementing the Disclosure Policy

# 3. DISCLOSURE POLICY PRINCIPLES

## 3.1. Authorized People

The Investor Relations Department manager has been assigned to carry out the information function and activities.

These authorities carry out these responsibilities in close cooperation with the Audit Committee and the Board of Directors.

### 3.2. Methods and Tools for Public Information

In line with all Capital Markets Legislation, TCC and BIST regulations, including CMB and its complementary texts, and any changes that may occur in them; The communication methods and tools that our company will use for public disclosure purposes are listed below. Depending on the nature of the disclosure and the requirements of this nature, only one of these methods and tools can be used, or more than one tool can be used when necessary

- a) Special situation disclosure forms and general information form
- b) Annual and interim financial statements, footnotes, independent audit reports, activity reports and responsibility statements

- d) e-Company and e-General assembly system platforms,
- e) Announcements and announcements made through the Turkish Trade Registry Gazette and daily newspapers
- f) Corporate website of our company
- g) Press statements made via written, visual, digital and social media
- h) Informational and promotional documents prepared for investors and presentations promoting our Company,
- i) Phone, mobile phone, e-mail, telefax, social media etc. Statements made through communication methods and tools.

### 3.3. Disclosure of Special Circumstances to the Public

Special situation disclosures required to be made in accordance with the Special Case Notification are prepared in line with the information received from the relevant units and per the provisions of the Special Case Notification and are announced to the

public through the Public Disclosure Platform. Special situation disclosures announced on the Public Disclosure Platform are also available on our Company's website or a link address is provided for the period stipulated in the Special Event Communique.

### 3.4. Public Disclosure of Financial Statements and Activity Reports

Our company's annual and interim financial statements are prepared in accordance with Turkish Accounting Standards and Turkish Financial Reporting Standards (Turkish Accounting Standard/Turkish Financial Reporting Standard) in accordance with the Turkish Commercial Code, CMB and all Capital Markets Legislation including its supplementary texts. Financial statements prepared in accordance with the Turkish Accounting Standard / Turkish

Financial Reporting Standard are independently audited for the periods stipulated by the legislation and are disclosed to the public through the Public Disclosure Platform, together with the statement of responsibility and footnotes indicating their accuracy, by the authorized persons, following the approval of the Board of Directors with the approval of the Audit Committee within the framework of the Capital Markets Legislation.

Financial statements and footnotes disclosed to the public are published on our Company's website at the latest within the business day after the announcement is made and remain on the website for five years.

Activity Reports are prepared in accordance with the Turkish Commercial Code, CMB and all Capital Markets Legislation, including its supplementary texts, Corporate governance principles and

other relevant legislation, and are disclosed to the public through the Public Disclosure Platform following the approval of the Board of Directors in line with the periods and procedures specified in the legislation. Activity reports disclosed to the public are published on our Company's website at the latest within the business day following the announcement and are available on the website for five years.

### **3.5. Corporate Official Website**

Our company's corporate website ([www.kuzeyboru.com.tr](http://www.kuzeyboru.com.tr)) and Investor Relations page are designed

to contain all the information required in accordance with the relevant legislation, and this information is updated at necessary periods.

### **3.6. Ensuring the Confidentiality of Inside Information Until It Is Disclosure to the Public**

Insider knowledge, events and developments that have not yet been disclosed to the public and may affect the value and price of a company's capital market instruments and the investment decisions of investors.

The company may postpone the disclosure of internal information to the public in order to harm its legitimate interests, provided that the information is not misleading and that it can ensure that this confidential information is kept. Postponing the disclosure of such inside information is within the authority of the Board of Directors.

Once the reasons for postponement are eliminated, an explanation is made immediately along with the reasons for the postponement. If the internal weather event for which the announcement is postponed does not occur, the statement may not be made.

Our Company's employees who have inside information are informed that they are obliged to maintain the confidentiality of this information during the special situation and in the process of the formation of the special situation to its disclosure.

### **3.7. Persons with Administrative Responsibility and Persons Closely Related to These**

Persons with administrative responsibilities are determined by taking their duties within the organizational structure of our Company and the content of the information accessed by these persons as criteria. In this context, for our Company as a whole and not only for the current situation; Members of the Board of Directors and Auditors,

Executive Board Members, General Manager, Deputy General Managers, Managers, and people who have administrative responsibilities and have regular access to internal information, who have detailed information about future plans, have been determined as "persons with administrative responsibilities".

Accordingly, managers and other personnel who do not have enough information to affect the value of the capital market instrument and the investment decisions of investors, in other words, only have information

about a part of our Company and have limited information about the whole, are not considered within the scope of people who have administrative responsibilities and have access to inside information.

### 3.8. Public Disclosure of Future Assessments

Our company may, from time to time, announce its future evaluations in accordance with the Special Circumstance Communiqué. In writing documents explaining future evaluations, possible risks, uncertainties, and other factors; It is clearly stated that the actual and actual results that are likely to occur in the future may differ significantly from expectations.

Future assessments can only be made by persons authorized to make public statements, by clearly stating the above warnings or by referencing an existing and publicly available written document (Special Case statement, press release, information document, etc.). Forward-looking assessments are based on reasonable assumptions and estimates and may be revised in case of deviation due to unforeseen risks and developments. If future evaluations are disclosed to the public, the following principles are observed within the framework of CMB legislation:

a) Forward-looking evaluations can be disclosed to the public, provided that it is subject to the decision of the board of directors or, if authorized by the board of directors, the written approval of the authorized person.

b) Forward-looking evaluations are disclosed to the public at most four times a year. This disclosure can be made in the form of a material event disclosure, or it can be made through activity reports announced within the framework of the Board's regulations on financial statements or through presentations to inform investors, provided that they are disclosed on the Public Disclosure Platform.

c) If a significant change occurs in the publicly disclosed evaluations, or if the predictions and basis in the announced forward-looking information are not realized to a significant extent, or if it is understood that they will not be realized, the changes in expectations are shared with investors by making a special event disclosure without being subject to any number limitation.

d) In the statements to be made regarding future evaluations, if there is a significant difference between the matters previously announced to the public and the actualization, the reasons for these differences will be included.

### 3.9. Attitude Towards Unfounded News and Rumors

Our company, in principle, does not express any opinion on unfounded or false news, market rumors and speculations. Such news and rumors are followed by the relevant units of our Company and reported to the responsible Board member and the Investor Relations Unit. The responsible Board member and the Investor Relations Unit evaluate whether this news and information will have an impact on capital instruments. It is decided by the responsible Board

member and the Investor Relations Unit to obtain the opinion and approval of the Board of Directors on whether or not to make a special situation disclosure within the framework of Article 9 of the Special Circumstance Communiqué. In addition, if a request for verification is received from CMB and/or BIST within the provisions of the Capital Markets Legislation or if the management decides that an answer is necessary and more appropriate; A statement is made about the rumors and unreal news appearing in the market.

## 4. ENFORCEMENT

The Disclosure Policy is approved by the decision taken by the Board of Directors and published on the internet website.

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