INVEO YATIRIM HOLDING AŞ INFORMATION POLICY

1. OBJECTIVE

The objective of Inveo Yatırım Holding AŞ Information Policy is to provide all beneficiaries equally with a continuous, effective and transparent communication for the transmission of all non-trade secret information in full, just, accurate, on time, apprehensible, analyzable and easily accessible manner with minimum costs.

2. SCOPE

The Disclosure Policy covers all direct or indirect subsidiaries of Inveo Yatırım Holding.

3. GROUNDS

This policy has been constituted within the framework of the Regulations of Capital Market Board and in consideration of the provisions available in Capital Market Board public disclosure regulations.

4. **DEFINITIONS**

In this Policy;

Inside Information: Information, events and developments that have not yet been disclosed to the public that may affect the value and price of capital market instruments or the investment decisions of investors,

Law: Capital Market Law No. 6362,

KAP: Public Disclosure Platform,

MKK: Central Registry Agency Inc.,

CMB: Capital Markets Board,

Company or Inveo Yatırım Holding: Inveo Yatırım Holding A.Ş.

means.

5. DEFINITIONS OF RESPONSIBILITY AND AUTHORITY

The Company's Disclosure Policy is decided by the Board of Directors, announced to the public within the framework of capital market regulations, and published on the Company's website. The Board of Directors is responsible for monitoring, reviewing and developing the Disclosure Policy. The Corporate Governance Committee assists the Board of Directors in matters related to the Disclosure Policy. Implementations of the Disclosure Policy are the responsibility of the Assistant General Manager or Director, to whom this department reports, especially the Investor Relations Department. This task is carried out in coordination with the General Manager of the Company and the Corporate Communications Department.

The Investor Relations Department shares any and all information about the company that has been disclosed to the public before, treating all shareholders equally. Shareholders and stakeholders may communicate with persons authorized by managers with administrative responsibility within the scope of the disclosure policy. Employees other than these persons cannot respond to questions and information requests from outside the company. The relevant provisions of the Capital Markets public disclosure regulations regarding the disclosure of future assessments are reserved.

6. METHODOLOGY AND MEANS OF INFORMING

While performing the Information Policy, our Company benefits from the methodology and the means indicated below:

- PDP Material Disclosures
- Interim period and annual financial reports Decently published in KAP,
- the website of the Company at <u>www.inveo.com.tr</u>
- Press releases made through written, visual, auditory and social media,
- Explanations made to data distribution organizations,
- Presentations, information notes, information and promotional documents prepared for investors,
- Meetings and information meetings held with capital market participants face-to-face or through other means of communication,
- Publications and announcements through daily newspapers and Trade Registry Gazette
- Prospectus, circular, announcement texts, etc., which must be prepared in accordance with the CMB regulations. other documents,
- Communication methods through communication means such as telephone, e-mail, fax.

7. PRINCIPLES CONCERNING THE PRESENTATIONS AND REPORTS AT THE INFORMATION MEETINGS OR PRESS CONFERENCES

In case it is wished to announce the matters made subject to material events, including future assessments, through media organs or other communication means, a public disclosure is to be made at PDP simultaneously or before such announcement and it will also be published at Company website. Therefore, in order to ensure equality of information before investors, it is essential that the Investor Relations Department and the Corporate Communications Department work together and act in coordination before information meetings and press releases.

8. PRINCIPLES RELATED TO MEETINGS HELD WITH INSTITUTIONAL INVESTORS AND ANALYSTS

Presentations and reports used in meetings organized by company officials with institutional investors and analysts are published on the PDP or the Company's website in a way that does not lead to information inequality. The Company does not verify, approve or take responsibility for the analyst reports or revenue models prepared about it. On the other hand, in certain specific and limited cases and upon request, in order to prevent misinformation of the public, it may review analyst reports, provided that it uses only publicly disclosed and historical historical information and is limited to a specific topic. The Company may disclose to the public the analysts who prepare reports about themselves and the organizations they are affiliated with on the corporate website.

9. PRINCIPLES CONCERNING DISCLOSURE AND FOLLOWING OF THE NEWS AND RUMOURS THAT TAKE PLACE IN MEDIA ORGANS AND WEB SITES

The company follows the news and rumors that are made available in national or international media organs or in other communication channels through a media monitoring company and in the event that such news or rumors are different either from the information initially disclosed to

public or from the information which has already been publicly disclosed before; the company assesses the effects of it on the value and price of its capital market instruments as well as its effects on the investment decision of investors and if necessary makes an announcement with respect to the accuracy and sufficiency of the information in pursuance of the principles available in the capital market regulations. There is no obligation of the Company to make a public announcement in relation to the remarks, analyses, assessments and estimations based upon the information publicly disclosed through media organs or other communication means.

10. PRINCIPLES ON DETERMINING THE PERSONS HOLDING ADMINISTRATIVE RESPONSIBILITY

Within the framework of the Regulations of Capital Market, it is determined that the "Persons Holding Administrative Responsibility" in our Company are the Board Members of our Company, General Manager, if any, Members of the Executive Board, Chairman, Deputy Chairman, and Deputy General Managers and Directors.