

ESENBOĞA ELEKTRİK ÜRETİM A.Ş.

INFORMATION POLICY

I. SUBJECT

This Information Policy ("Policy" or "Information Policy"), within the framework of the regulations of Capital Markets Board ("CMB" or "Board"), Borsa İstanbul AŞ ("Borsa İstanbul") regulations, Turkish Commercial Code numbered 6102 ("TCC") and Capital Markets Law numbered 6362 ("CMB"), Special Cases Communiqué No. II-15.1 ("Special Cases Communiqué"), Corporate Governance Communiqué no.II-17.1 ("Corporate Governance Communiqué") and Corporate Governance Principles ("Corporate Governance Principles") in its annex, was prepared to regulate the principles of communication with all stakeholders, including investors, and was put into effect by the decision of the Board of Directors.

II. PURPOSE

The main purpose of this Information Policy is to ensure that information and developments that may affect the investment decisions of Esenboğa Elektrik regarding the past performance and future expectations, which do not have the characteristics of trade secrets, are presented to the stakeholders in a complete, fair, accurate, on time and understandable manner.

III. INFORMATION POLICY PRINCIPLES

1. Principals and Methods of Information Policy

Within the frame of SPK and BİST regulations and TCC, methods and tools used for public disclosure in accordance with the Disclosure Policy are as follows:

- (i) Material Event Disclosures on Public Disclosure Platform (KAP) and Company General Information Form
- (ii) Financial statements, footnotes, independent audit reports, annual reports and statements of responsibility that are periodically announced through KAP
- (iii) Corporate website (www.esenbogaelektrik.com.tr),
- (iv) Announcements and disclosures through Turkish Trade Registry Gazette or daily newspapers
- (v) Press releases through printed media, visual media and social media
- (vi) Information and discussion meetings with capital market participants, either face to face or via teleconference,
- (vii) Prospectuses, issuance documents, announcements and other documents issued in accordance with CMB regulations,
- (viii) Presentations, information and promotional documents prepared for investors.

2. Authorized Persons to Make a Public Disclosure

Explanations and information to be made on behalf of the company within the framework of the methods and tools mentioned above are made by the members of the Board of Directors and persons authorized by the Board of Directors, except for the forms, statements and reports signed in accordance with the signature circular.

3. Public Disclosure of Material Events

Disclosures, which has to be made within the framework of the Material Events Communiqué, are prepared within the framework of the information received from the relevant units in accordance with the provisions of the aforementioned communiqué and then announced to the public through KAP.

4. Disclosure of Financial Statements and Term Reports to Public

Company's annual and interim financial statements are prepared within the framework of the Turkish Commercial Code and capital markets legislation and also in accordance with Turkish Accounting Standards and Turkish Financial Reporting Standards. Financial statements are audited independently for the periods stipulated by the legislation. Within the framework of the capital market legislation, it is announced to the public through the Public Disclosure Platform (KAP) with the approval of Audit Committee and Board of Directors and together with the statement of responsibility stating its accuracy by authorized persons.

Annual Activity Reports are prepared in accordance with the TCC, CMB, Corporate Governance Principles and other relevant legislative regulations. The reports are disclosed to the public through the Public Disclosure Platform (KAP), after the approval of the Board of Directors in line with the periods and procedures specified in the relevant legislation.

5. Corporate Website

The corporate website of the company has been arranged to contain all the information in accordance with the legislation, and information are updated periodically.

6. Ensuring the Confidentiality of Insider Information Until Public Disclosure

Insider information is information, events and developments have not yet been disclosed to the public that may affect the value and price of the Company's capital market instruments and the investment decision of the investors.

The Company, may postpone the disclosure of insider information to the public in order not to damage its legitimate interests, mislead the investors and the company can postpone the disclosure provided that the information is kept confidential. Postponement of the disclosure of insider information is under the authority of the Board of Directors and the General Manager. After the reasons for postponement are eliminated, an explanation is made together with the reasons for the decision to postpone. If, the situation which causes the information postponed, does not occur, no disclosure may be made.

Company employees who have insider information are informed that they are obliged to protect the confidentiality in the process from the occurrence to the disclosure of the special situation.

7. Persons with Administrative Responsibility and Persons Closely Related with That

These persons are defined as follows within the framework of the Special Circumstances Communiqué:

- Members of the Board of Directors of the Company and persons who regularly access internal information of the Company directly or indirectly, although they are not a Board member,
- Affecting the future development and commercial objectives of the Company and persons who are authorized to make administrative decisions,
- Persons who have administrative responsibility considering the organizational structure and job descriptions of the company.

The shares representing the capital of persons with administrative responsibility and all transactions carried out in relation to other capital market instruments based on these shares must be disclosed to the public within the framework of the principles written in the Special Cases Communiqué by the transactors

8. Unusual Price and Quantity Movements

The Company makes an announcement to the public upon the request of the stock exchange when there are changes in the prices or transaction volumes of capital market instruments that cannot be explained by the usual market conditions. In this statement, it is stated whether there are any special cases that have not disclosed to the public yet, and if any, all special cases that have not disclosed, without indicating the postponement of the disclosure, are included.

9. News and Rumours in Media

The Company monitors the news about the Company in the press and similar communication channels. The Company detects the issues that may affect the value and price of capital market instruments or the investment decisions of investors, news or rumours that are different from the information that were first announced to the public through the press or other communication means or that were previously announced to the public. In this case, whether these are correct or sufficient, a public disclosure is made by the Board or the relevant exchange without waiting for any warning, notification or request. Within the framework of the principles specified in the comments, analyses, evaluations and estimates made about the Company based on publicly disclosed information are excluded from this scope. If the news, market rumours and speculations in press do not fall within the definition of insider information, no disclosure may be made about them.

10. Public Disclosure of Future Assessments

Public disclosure of forward-looking assessments is not mandatory. However, the Company may announce its future evaluations within the framework of the Special Cases Communiqué, with the decision of the Board of Directors or with the written approval of the authorized person.

Future evaluations are made public at most 4 times a year. This disclosure can be made in the form of a material event disclosure, as well as through annual reports or presentations on informing the investors, provided that it is disclosed through KAP. In the explanations regarding future evaluations, if there is a significant difference between the issues previously disclosed to the public and the realizations, the reasons for these differences are included.

11. Meetings with Investors and Analysts

Investors, potential investors and other capital market participants can communicate with persons authorized by the Company, and Company employees other than these persons should not respond to questions and information requests from the Company.

The Company may organize and participate in conferences and meetings in order to share financial, operational and strategic developments about the Company with investors and / or analysts. Presentation that shared with investors at investor information meetings, are published on the corporate website of the Company.

Analyst reports are considered the property of the organization that prepared the report and they are not published on the Company's corporate website. The company is not responsible for reviewing, checking and confirming analyst reports and its comments, estimates and evaluations. On the other hand, in certain and limited cases and upon request, in order to prevent misinforming the public, the company may review the analyst reports, provided that only public and historical information is used and limited with a specific issue.