

**INVEO YATIRIM HOLDING A.Ş.  
DISCLOSURE POLICY**

## Table of Content

1. PURPOSE.....	3
2. SCOPE .....	3
3. PROVISION .....	3
4. DEFINITIONS .....	3
5. DEFINITIONS OF RESPONSIBILITIES AND AUTHORITY .....	3
6. INFORMATION METHODS AND TOOLS .....	4
7. PRINCIPLES OF PRESENTATIONS AND REPORTS ANNOUNCED IN INFORMATION MEETINGS OR PRESS CONFERENCES .....	4
8. PRINCIPLES OF MEETINGS ORGANIZED WITH INSTITUTIONAL INVESTORS AND ANALYSTS .....	4
9. PRINCIPLES OF FOLLOWING NEWS AND REPOSITIONS ON THE PRESS, BROADCAST AND WEB SITES AND MAKING THE RELATED EXPLANATIONS .....	5
10. PRINCIPLES USED IN DETERMINING THE PERSONS WITH ADMINISTRATIVE RESPONSIBILITY ...	5
11. MEASURES TO ENSURE CONFIDENTIALITY UP TO THE DISCLOSURE OF SPECIAL CIRCUMSTANCES .....	5
12. PRINCIPLES OF THE DISCLOSURE OF FUTURE ASSESSMENTS.....	6

## 1. PURPOSE

The purpose of this Inveo Yatırım Holding A.Ş. Disclosure Policy, is to provide a continuous, effective and transparent communication to all stakeholders equally, in a timely, accurate, complete, direct, understandable, adequate and easily accessible manner in accordance with the capital market regulations and the principles of public disclosure.

## 2. SCOPE

The Disclosure Policy covers all direct and/or indirect subsidiaries of Inveo Yatırım Holding A.Ş.

## 3. PROVISION

This policy has been established within the framework of the provisions of the Capital Market Legislation; therefore, the Capital Market public disclosure regulations. Inveo Yatırım Holding A.Ş is in compliance with the Turkish Commercial Code, Borsa İstanbul A.Ş. and with MKK regulations.

## 4. DEFINITIONS

In this policy the terms used are as follows;

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 Securities Depository of the Turkish capital markets

SPK : Capital Markets Board of Türkiye

Company or Inveo : Inveo Yatırım Holding A.Ş.

## 5. DEFINITIONS OF RESPONSIBILITIES AND AUTHORITY

The Board of Directors establishes the Company's Disclosure Policy, which is then communicated to the public and made available on the Company's website in accordance with capital market requirements. The Disclosure Policy must be monitored, reviewed, and developed by the Board of Directors. The Corporate Governance Committee assists the Board of Directors in matters related to the Disclosure Policy.

The Disclosure Policy implementation is carried out by the Investor Relations Department and The Assistant General Manager or Director holds the responsibility.

This policy is carried out in coordination with the General Manager of the Company and the Corporate Communications Department. The Investor Relations Department manages the communication with shareholders regarding company information that has previously been made public. Only individuals authorized by managers with administrative authority may contact shareholders and stakeholders within the parameters of the disclosure policy. Other employees

are prohibited from responding to inquiries and information requests from customers and clients. The relevant provisions of the Capital Markets public disclosure regulations regarding the disclosure of future assessments are reserved.

## 6. INFORMATION METHODS AND TOOLS

Inveo can use the following communication methods and tools for public disclosure:

- › Material event disclosures and company general information form announced on the KAP,
- › Financial statements, independent audit reports and activity reports announced in the KAP,
- › Corporate website ([www.inveo.com.tr](http://www.inveo.com.tr)),
- › Press releases made in the printed, visual or digital media,
- › Disclosures made to data distribution companies,
- › Information and supportive documents prepared for investors; presentations about the Company,
- › Investor and analyst meetings; interviews and meetings with capital market participants, including those in the digital platforms,
- › Declarations and announcements made through the Turkish Trade Registry Gazette and daily newspapers,
- › Prospectus, circulars, issuance documents, announcements and other documents to be prepared in accordance with the SPK regulations,
- › Communication methods through tools such as telephone, e-mail, investor relations application.

## 7. PRINCIPLES OF PRESENTATIONS AND REPORTS ANNOUNCED IN INFORMATION MEETINGS OR PRESS CONFERENCES

When making announcements through the media or other channels that are subject to specific conditions such as forward-looking assessments, a statement is issued on the KAP either prior to or concurrently with the announcement, and is also uploaded on the company website. In order to guarantee the equality of information before the investors, the Investor Relations Department and the Corporate Communications Department must collaborate and act in coordination prior to informational meetings and press releases.

## 8. PRINCIPLES OF MEETINGS ORGANIZED WITH INSTITUTIONAL INVESTORS AND ANALYSTS

Presentations and reports used in meetings held by company officials with institutional investors and analysts are published on the Public Disclosure Platform or on the Company's website in a way that does not cause information inequality. Analyst reports and revenue models that have been generated regarding the company are not confirmed, approved, or taken under its responsibility. To prevent misleading the public, analysts may, under particular, limited conditions, and upon request, examine their findings using only information that has been made publicly available in the past and is limited to a single issue. The company may publicly disclose its analysts and affiliated companies on its website.

## 9. PRINCIPLES OF FOLLOWING NEWS AND REPOSITIONS ON THE PRESS, BROADCAST AND WEB SITES AND MAKING THE RELATED EXPLANATIONS

Through a media monitoring firm, the company follows news and rumors in local, national, and international media as well as other communication channels. In the presence of news or rumors with a different content than the information announced to the public for the first time or previously announced to the public; the media monitoring firm assesses the value and price of the company's capital market instruments or their impact on investors' investment decisions, and if necessary, a public statement is made immediately regarding whether they are accurate or sufficient in accordance with the capital market legislation's guiding principles. The Company is under no obligation to provide comments, analyses, evaluations, or estimations based on information that has been made public through the press, media outlets, and other channels of communication available to the public.

## 10. PRINCIPLES USED IN DETERMINING THE PERSONS WITH ADMINISTRATIVE RESPONSIBILITY

Within the framework of the capital markets legislations, "Persons with Administrative Responsibility" in the company have been determined as the company's Board Members, General Manager, Executive Board Members, if any, Chairman, Deputy Chairman, Deputy General Managers and Directors.

## 11. MEASURES TO ENSURE CONFIDENTIALITY UP TO THE DISCLOSURE OF SPECIAL CIRCUMSTANCES

The company notifies the information pertaining to the individuals who have access to insider knowledge and makes the appropriate modifications in the event that the aforementioned information changes by submitting relevant data into MKK's system in compliance with the law. Following these submissions, MKK compiles a list of those who have access to the company's inside information, which is then given to the Capital Markets Board and the appropriate stock exchange upon request. Persons with access to inside information are advised in writing of their legal obligations surrounding inside information, as well as the penalties for misusing this knowledge, within the scope of the Capital Market Public Disclosure Act.

The Company may postpone the public disclosure of inside information in order to protect its legitimate interests, as long as this does not cause investors to be misled and it is able to ensure the confidentiality of such information. In these situations, the Company shall take all possible measures to ensure the confidentiality of inside information in accordance with the capital market legislation.

If the financial reports adhere to the capital market rules, the firm implements a "silent period" before they are published to the public in compliance with the law. The silent period is the period from the day after the accounting period ends, during which the pertinent financial reports are generated, until the public is informed of the stated tables and reports in line with the law. The company remains silent over the upcoming financial reporting period during this time, declining to comment, give an opinion, or respond to inquiries. However, company representatives are allowed to take part in conferences, seminars, panels, and similar events as long as they refrain



from sharing any information or making any comments regarding the next financial statement period.

## 12. PRINCIPLES OF THE DISCLOSURE OF FORWARD LOOKING ASSESSMENTS

Inveo can disclose forward-looking statements to the public as per the principles set out in the capital market legislation. In this context, forward-looking statements may be disclosed to the public, provided that they are subject to the decision of the Board of Directors or, if authorized by the Board of Directors with a written approval. Forward-looking statements can be disclosed to public no more than four times within a year, and can be formed of a material event disclosure, or may be disseminated through annual or interim activity reports or presentations to inform investors, provided that they are disclosed in the KAP. If the expectations and assumptions expressed in the forward-looking statements disclosed to the public are not realized significantly or turn out to be impossible to be realized, the revised expectations shall be disclosed to the public through material event disclosures without any limitation in terms of the number of the disclosure. In case of significant differences between the expectations previously announced to the public and the actualizations, the reasons for such differences are also included in the forward-looking statements.