

## **ANNEX 9/2: PUBLIC DISCLOSURE POLICY**

### **Article 1: Scope and Legal Basis**

This public disclosure policy determines the principles regarding the information to be provided by Aydem Yenilenebilir Enerji A.Ş. ("Company") within the scope of the relevant regulations.

This policy has been prepared within the scope of Capital Markets Law No. 6362, Turkish Commercial Code No. 6102, Communiqué on Special Circumstances No. II-15.1 and related legislation.

The Company's Investor Relations Department is responsible for overseeing and monitoring this policy.

### **Article 2: Objective**

The objective of the public disclosure policy is to ensure an active, effective and transparent communication with all beneficiaries, including shareholders, investors and employees, in compliance with the regulations to which the Company is subject and the provisions of the articles of association, by simultaneously sharing all kinds of information that do not constitute trade secrets in a complete, fair, accurate, timely, understandable, low-cost and easily accessible manner.

The objective of the public disclosure policy is to share the Company's past performance, future expectations, strategies, targets and vision, excluding trade secrets, with the public, relevant authorities, existing and potential investors and shareholders in an equal manner, taking into account the Company's strategies and performance; to announce the Company's financial information in an accurate, fair, timely and detailed manner within the framework of generally accepted financial reporting principles and Capital Markets Board ("CMB") regulations; and to provide a continuous, effective and open communication platform by the investor relations unit. While following an active and transparent disclosure policy, the Company aims to comply with CMB and Borsa Istanbul A.Ş. regulations in all public disclosure practices and to implement the most effective communication policy.

### **Article 3: Tanımlar**

**Aydem Yenilenebilir Enerji:** means Aydem Yenilenebilir Enerji A.Ş.

**CMB/Board:Capital Markets Board**

**Law:** Capital Markets Law No. 6362

**Public Disclosure Platform (PDP):** The electronic system through which the information required to be disclosed to the public pursuant to the legislation is transmitted and announced to the public with electronic signature,

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

**Special Circumstances:** Internal or continuous information that may affect the value and price of capital market instruments or the investment decisions of investors,

**Continuous Information:** All information, events and developments that fall outside the definition of internal information,

**Communiqué:** Communiqué on Special Circumstances numbered II-15.1

#### **Article 4: Public Disclosure Principles**

Public disclosure principles are made within the scope of Capital Markets Law No. 6362, Turkish Commercial Code No. 6102, Communiqué on Special Circumstances No. II-15.1, Special Circumstances Guide and related legislation.

The principles that give rise to the obligation to disclose continuous information are specified in detail in the Communiqué, and the Investor Relations Department is responsible for the follow-up of the continuous information notifications required by Aydem Yenilenebilir Enerji, provided that the necessary information flow has been notified to them.

Whether a possible situation other than continuous information will have an impact on the value and price of the capital market instrument and the investment decisions of investors depends on the size and structure of the enterprise, the relevant sector, competitive conditions, market expectations and other relevant factors, and Aydem Yenilenebilir Enerji is obliged to disclose this information within the scope of the communiqué.

In order to evaluate whether the disclosure of internal information to the public is required, the relevant unit managers and in any case the General Manager of Aydem Yenilenebilir Enerji are obliged within the scope of their duties and information to convey the situations that may qualify as internal information to the Investor Relations Department immediately and by protecting the confidentiality of the information.

The information communicated to the Investor Relations Department within the scope of the provision in the preceding article is evaluated by the Investor Relations Department of Aydem Yenilenebilir Enerji within the framework of events and developments that may have an impact on the value of the capital market instrument due to the financial status and activities of Aydem Yenilenebilir Enerji, that may affect the investment decisions of the investors or for them to exercise their rights. While making this assessment, the Investor Relations Department takes the data communicated to it and the conditions specific to Aydem Yenilenebilir Enerji as basis and proceeds in agreement with the General Manager of Aydem Yenilenebilir Enerji by examining each situation separately while evaluating whether it will have an impact on the value and price of the capital market instrument and the investment decisions of investors.

In cases where the disclosure of internal information may adversely affect the legitimate interests of Aydem Yenilenebilir Enerji, Aydem Yenilenebilir Enerji has the right to postpone the disclosure, provided that the conditions specified in the Communiqué on Special Circumstances and Guidelines are met. Aydem Yenilenebilir Enerji takes all necessary measures to keep the internal information within the scope of postponement confidential. As soon as the reasons for postponement of public disclosure of internal information are eliminated, Aydem Yenilenebilir Enerji discloses the said internal information to the public in accordance with the principles written in the relevant communiqués. In the statement to be made, the postponement decision and the underlying reasons are stated. During the period when the disclosure is postponed, if, due to the fault of the persons who are obliged to keep the information confidential, rumors arise about the information whose disclosure is

postponed, or if some details are disclosed to the public in any way, the confidentiality of the postponed information is eliminated. In this case, Aydem Yenilenebilir Enerji shall immediately make a public disclosure due to the failure to protect the confidentiality of the information.

The Company's public disclosure policy is established and implemented under the authority of the Board of Directors. Within the framework of this policy, the disclosure methods and tools used by the Company are periodically issued financial statements, independent auditor's report and statements, annual and interim activity reports, the Company's corporate website ([www.aydemyenilenebilir.com.tr](http://www.aydemyenilenebilir.com.tr)), special circumstance disclosures, announcements and declarations made through the commercial registry gazette, communication methods such as teleconferences, telephone, e-mail, fax, social media, print and visual media, and information meetings held face-to-face or via teleconference with investors.

Information requests submitted to the Company by shareholders, investors and analysts are responded to by the investor relations unit in writing, verbally or through information meetings within the framework of publicly disclosed information. Following the announcement of the Company's interim and annual financial and operational results, teleconferences are organized to answer the questions of analysts and investors and to discuss publicly. From time to time, Company officials may attend conferences or meetings at national and international level to share information with investors and analysts.

As a rule, disclosures and information to be made on behalf of the Company within the framework of the above-mentioned methods and tools, except for the forms, statements and reports signed in accordance with the signature circular, are made by the members of the board of directors, CEO, CFO, investor relations unit manager. Unless specifically assigned, Company employees cannot answer questions from capital market participants. Incoming information requests are directed to the investor relations unit.

In addition, the investor relations unit will be able to communicate on behalf of the Company in promoting the Company before existing and potential investors and institutions and brokerage houses in Turkey and abroad, meeting the information requests of analysts and research specialists working in these institutions, and responding to the questions submitted to them within the scope of investor relations.

Special circumstance disclosures are prepared by the Investor Relations Department, signed electronically and disclosed to the public through the Public Disclosure Platform ("PDP"). The Investor Relations Department makes public disclosures immediately by using the Public Disclosure Platform formats, unless otherwise stated in the communiqué.

The Investor Relations Department is authorized and responsible for the coordination of the fulfillment of the special circumstance disclosure obligation at Aydem Yenilenebilir Enerji.

In principle, special circumstance disclosures are signed by the Assistant General Manager in charge of Financial Affairs (CFO), Investor Relations Department Manager/Authorized and/or Budget and Reporting Manager and Accounting Manager and sent to PDP. The names of the persons authorized to make special circumstance disclosures on behalf of the Company and any changes are notified to the Stock Exchange.

Special circumstance disclosures are also published on the corporate website in Turkish and English.

Special circumstance disclosures are prepared in a timely, accurate, understandable, adequate and free from misleading statements in order to help the persons and organizations that will benefit from the disclosure to make decisions. When an incorrect information is published, this situation should be corrected immediately with a new disclosure. Corrections are repeated by using the relevant form on the PDP, with a title indicating that the disclosure is a correction disclosure and answering the questions asked in the relevant form.

The language of all public disclosures is Turkish. However, in cases where the disclosures are required to be published simultaneously in English as well as Turkish within the framework of the CMB legislation and the Board's regulations on corporate governance, disclosures are made in both languages.

If any Company employee determines that any important and private information that has not been disclosed to the public before has been disclosed to the public unintentionally, he/she immediately notifies the investor relations unit. The Investor Relations Department prepares an appropriate material event disclosure in accordance with the provisions of the legislation and submits it to the PDP.

The Investor Relations Department announces the special circumstance disclosures on the Investor Relations page of the Company's corporate website ([www.aydemyenilenebilir.com.tr](http://www.aydemyenilenebilir.com.tr)) as specified in the PDP within the business day following the public disclosure at the latest and is obliged to keep the said disclosures on the Company's corporate website ([www.aydemyenilenebilir.com.tr](http://www.aydemyenilenebilir.com.tr)) for the period specified in the communiqué. This obligation can also be fulfilled by providing a link to the disclosures on the PDP on the Company's corporate website ([www.aydemyenilenebilir.com.tr](http://www.aydemyenilenebilir.com.tr)).

The Company does not provide guidance on expectations regarding interim and annual activity results. Instead, the Company prefers to inform capital market participants about the critical issues affecting its activity results, its strategic approaches and important elements that provide a better understanding of the sector and the environment in which it operates.

From time to time, the Company may disclose its future expectations to the public in accordance with its public disclosure policy. Future assessments may be disclosed on PDP in special circumstance disclosure format or in presentation format. It is submitted for the information of those concerned that the future assessments disclosed to the public are based on certain assumptions and may differ from the actual results. In case there are changes regarding the future assessments or if it is understood that the assessments will not be realized, the public is informed by the same means without delay.

The public disclosure policy has been established and approved by the Board of Directors within the framework of the relevant legislation. Monitoring, supervision and development of the public disclosure policy is under the authority and responsibility of the board of directors. The Investor Relations Unit has been assigned to oversee and monitor all matters related to public disclosure.

This Public Disclosure Policy has been updated with the Board of Directors' resolution dated 20/01/2023 and numbered 2023/02, and any amendments to this policy are subject to the approval of the Board of Directors.