## INFORMATION DISCLOSURE POLICY OF EYH ECZACIBAŞI INVESTMENT HOLDING CO

**1. Purpose:** The purpose of the disclosure policy is to share the past performance, future expectations, strategies, knowledge other than those involving trade secrets, goals and the vision of EYH Eczacibaşi Yatırım Holding Ortaklığı A.Ş. (EYH), with the public, the authorities, existing and potential investors and shareholders in a complete, fair, timely, clear and equal manner; to maintain active and transparent communication at all times.

While pursuing this policy, EYH complies with legal regulations, Capital Markets Legislation, regulations of the Capital Markets Board and Istanbul Stock Exchange and Capital Markets Board's Corporate Governance Principles.

**2. Power and Responsibility:** At EYH, it is the responsibility of the Board of Directors to develop, pursue, supervise and improve the information disclosure policy. The information disclosure policy which is approved by the Board of Directors is announced to the public via our company's web site. Capital Markets and Shareholder Relations unit is responsible for the coordination of the information disclosure policy. This unit fulfills its responsibility in close coordination with the Board of Directors and Auditing Committee.

This power and responsibility is fulfilled in close cooperation with Eczacıbaşı Holding AŞ, investor relations officials.

- **3. Method and Tools of Public Disclosure:** EYH utilizes the following methods and tools in determining its public disclosure and information policy, together with regulations of the Capital Markets Board and Istanbul Stock Exchange.
- Disclosures on special events which have been prepared using BIY software and announced to the public electronically via Public Disclosure Platform (Disclosures on special events which have been published without any problems in the publication site of the Public Disclosure Platform, are faxed in order to be published in the daily bulletin and web site of Istanbul Stock Exchange)
- Periodic financial reports which have been prepared using BIY software and announced to the public electronically via Public Disclosure Platform (Financial reports which have been published without any problems in the publication site of Public Disclosure Platform are submitted to Istanbul Stock Exchange in a sealed envelope, on the same work day they are published.)
- Announcements and declarations made through Turkish Commercial Registry Gazette and daily newspapers (prospectus, circular, invitation for general assembly, announcement of distribution of profit, etc.),
- Prospectus, circular, announcements and other documents that are required by the Capital Markets provisions,
- Statements to the data distribution organizations such as Reuters, Foreks, etc.,
- Press statements through the press and visual media,
- Corporate web site, web site containing information on investor relations (<u>www.eczacibasiyatirim.com.tr</u>)
- Information meetings conducted one on one, or via telephone with the capital market participants,
- Communication methods and tools such as telephone, e-mail, telefax, etc.
- **4. Disclosure on Special Events and Related Officials:** Disclosures on special events are prepared and signed by the Director of Financial Affairs and official of the Relations with Shareholders unit and they are announced to the public via Public Disclosure Platform and faxed to Istanbul Stock Exchange on the same day. In case of absence of the related persons, General Manager and members of the Board of Directors are authorized to sign. Following the announcement in the Public Disclosure Platform, they are published in the web site of EYH, which contains information on investor relations (www.eczacibasiyatirim.com.tr) Such disclosures on special events are kept in the web site for a period of five years.
- **5. Disclosure of the Financial Statements to the Public:** The financial statements of EYH and their footnotes, are prepared in accordance with the provisions set forth by the Capital Markets Board and International Financial Reporting Standards.
- In accordance with the Capital Markets Legislation, prior to disclosure of the financial statements and footnotes to the public, they are submitted to the Board of Directors for approval upon the positive opinion of

the Auditing Committee. The financial statements, footnotes and independent audit report (if available), annual report of the Board of Directors are delivered to the Istanbul Stock Exchange, after the declaration of accuracy is signed by the General Manger and Director of Financial Affairs, in accordance with Capital Markets Law and regulations of Istanbul Stock Exchange. The said report may be reached retrospectively in the web site of EYH, which contains information on investor relations (www.eczacibasiyatirim.com.tr)

- 6. Disclosure of Annual Report to the Public: Annual report is prepared in accordance with the Capital Markets legislation and corporate governance principles of the Capital Markets Board. It is approved by the Board of Directors and announced to the public together with the financial statements. It is disclosed to the public via the web site which contains information on the investor relations. (www.eczacibasiyatirim.com.tr). Moreover, hard copies of the annual report which is available on the web site (www.eczacibasiyatirim.com.tr) may be obtained from the Capital Markets and Shareholder Relations unit.
- 7. Announcements and Statements Made Through the Turkish Trade Registry Gazette and Daily Newspapers: In accordance with the Capital Markets Law, Turkish Commercial Code and our Articles of Association; the announcements regarding General Assembly, capital increment and dividend payments are announced both in Turkish Trade Registry Gazette and in daily newspapers.
- 8. Statements Regarding Using Shareholder Rights: Within the framework of Capital Markets regulations, shareholders are informed about issues which concern them, such as General Assembly, Capital increment, dividend payments, integration and division, via prospectus and announcement texts. These documents are also published in the web site of EYH, which contains information on investor relations (www.eczacibasiyatirim.com.tr)
- **9.** Press statements made through the press and visual media: Communications with the press and visual media, are executed together with the Corporate Communication unit of Eczacıbaşı Holding AŞ.
- **10.** Corporate Web Site: As suggested by the Corporate Governance Principles of the Capital Markets Board, the web site which contains information on investor relations (<u>www.eczacibasiyatirim.com.tr</u>) is used actively for public disclosure. Capital Markets and Shareholder Relations unit is responsible for the preparation of the information on the web site.
- All announcements made by EYH to the public are made available in the web site (www.eczacibasiyatirim.com.tr) The information in the web site is structured and classified accordingly. All measures are taken to provide the security of the web site. The web site is prepared in line with the Corporate Governance Principles of Capital Markets Board. In particular, announcement of General Assembly meetings, information about items on the meeting agenda and participation to General Assembly are included in the web site. The web site is updated and improved constantly.
- **11.Meetings and Contacts With Investors and Analysts:** Capital Markets and Shareholder Relations Unit is established under the supervision of the Directorate of Financial Affairs, to regularly handle the relations with both existing and potential shareholders, to respond to the questions of the investors in the most efficient manner and to exercise the efforts for enhancing the company values. The informing of senior managers about any meeting demands of the shareholders is provided by this unit.
- EYH acknowledges that the analyst reports are the property of the company which prepares the analyst reports, and does not publish them in the web site (<u>www.eczacibasiyatirim.com.tr</u>). EYH does not review, verify, approve the analyst reports or income models, and does not take responsibility for the same.
- **12.Silence Period:** In order to prevent asymmetric information distribution and unauthorized disclosure about activity reports, EYH avoids discussing financial results and other related issues with capital market investors, during specific periods of the year. This period is called the "silence period". For EYH, the silence period starts on the 15th day of the month after the last month of the annual account period, with intervals of three months. It ends one day after the financial reports are disclosed to the public. During the silence period;
- Financial situation of EYH, except for publicly disclosed information, shall not be discussed in one to one meetings or meetings held in groups, with capital market investors.
- Unless it is required to do so, and provided that the provisions of the Capital Markets Legislation are reserved, no comments regarding activities and financial situation shall be made.

- Except for publicly disclosed information on financial results, questions asked individually or by small groups shall not be answered; no statements shall be made to such groups. In such case, statements will be made in the web site (www.eczacibasiyatirim.com.tr)
- **13.Unfounded News:** In principle, EYH does not comment on market rumors and speculations. If/when unfounded news which appear to be rumor or gossip are encountered, a press announcement may be made by people authorized to make public announcements, to state that not commenting on unfounded news which appear to be rumor or gossip is a part of EYH's information policy. However, if deemed necessary, and in line with the Capital Markets Legislation, "verification obligation" may be implemented and comments may be made regarding the rumors and gossip.
- **14.Forward Looking Statements:** EYH, does not make any statements regarding expectations about the results of interim period activity or annual activity. Instead, EYH prefers to convey critical issues which influence activity results, its strategic approaches, and important factors which enable a better understanding of the business environment which and the sector, to capital market investors.

No publicly undisclosed and important / private information is disclosed in non-public interviews made with capital market investors. However, EYH, may make forward-looking statements under special circumstances, from time to time. In such cases, it should be kept in mind that, the forward-looking statements contained in the written documents of EYH are provided based on certain assumptions; and that the actual results may be considerably different from the results expected in the declarations due to risks, ambiguities, and other factors. Unless otherwise stated in the information disclosure policy, communication with capital market investors on behalf of EYH may only be carried out via persons authorized to make public disclosures.