

**ARZUM ELEKTRİKLİ EV ALETLERİ SANAYİ VE TİCARET A. Ş.**  
**PUBLIC DISCLOSURE PROCEDURE**

**1. GROUND**

1.1.This Procedure is issued, based on Article 15 of the Capital Markets Law No. 6362 ("Law") and Article 24 of the Capital Markets Board ("CMB/Board") Communiqué On Material Events Disclosure No. II-15.1 ("Communiqué").

**2. OBJECTIVE**

2.1.This document aims to effectively implement public disclosure practices in Arzum Elektrikli Ev Aletleri Sanayi ve Ticaret A. Ş. ("Arzum/Company") within the framework of the Capital Markets Board Public Disclosure regulations.

**3. SCOPE**

3.1.This procedure covers all public disclosure activities carried out by Arzum within the framework of the Capital Markets Board regulations.

**4. AUTHORITY AND RESPONSIBILITY**

4.1.Our Company's Public Disclosure Procedure ("Procedure") is established and implemented under the authority of the Board of Directors. The Board of Directors also reserves the right to make amendments in this Procedure from time to time in accordance with the relevant regulations. This Procedure and the changes to be made in the Procedure are implemented following the approval of the Board of Directors. This Procedure and the amendments to be made in this Procedure are implemented upon the approval of the Board of Directors.

The Company's Investor Relations Department is responsible for surveying and monitoring this procedure.

**5. DEFINITIONS**

5.1. In this procedure, following terms have following meanings:

**CMB/Board:** Capital Markets Board

**Law:** The Capital Markets Board Law 6362

**Public Disclosure Platform (PDP):** Refers to an electronic system to which the information required to be disclosed to public pursuant to the legislation are transmitted with electronic signature for disclosure to public

**Inside Information:** Refers to non-public information, events and developments that may affect the value or price of securities or the investment decisions of investors

**MKK:** CSD of Türkiye

**Material Events:** Refers to insider or ongoing information which may affect the value or price of securities or the investment decisions of investors

**Ongoing Information:** Refers to all information, events and developments uncovered by the definition of insider information

**Communiqué:** II-15.1 Communiqué On Material Events Disclosure

**6. CODES OF PRACTICE**

6.1.When any change occurs or is learned about inside information and the issues previously disclosed by the Company, it is obligatory to make a special circumstances disclosure within the framework of the Board's public disclosure regulations.

6.2.In cases of preliminary research, pre-interview and/or in cases that are binding and not yet evident;In order not to cause different interpretations and evaluations to market participants, since the disclosure of this information to the public in its current state may be misleading; any ways to comply with the necessary precautions for confidentiality are followed meticulously during the formation process of the internal information to ensure its confidentiality, by means of concluding confidentiality agreements by the Company, creating a list of those who have access to inside information, informing about the legislation and similar ways.

6.3. The matter of whether the inside information is concrete or not is evaluated separately during the formation of the information and at each stage of the process.

## **7. PROCESS MANAGEMENT**

### **7.1. Determining the Need for Public Disclosure**

- 7.1.1. The principles that create the obligation to disclose ongoing information are detailed in the Communiqué, and the Investor Relations Department is responsible for the follow-up of the mandatory continuous information notifications to be made by Arzum, provided that the necessary information flow is notified to them.
- 7.1.2. Whether a possible situation other than ongoing 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, competition conditions, market expectations and other relevant factors, and Arzum is obliged to disclose this information within the scope of the communiqué.
- 7.1.3. In order to evaluate whether the inside information should be disclosed to the public; the relevant unit managers and in any case, Arzum Financial Affairs Assistant General Manager are responsible for reporting the situations that may be of internal information nature to the Investor Relations Department immediately and by protecting the confidentiality of the information.
- 7.1.4. The information communicated to the Arzum Investor Relations Department within the scope of the provision of 7.1.3 is evaluated by the Arzum Investor Relations Department in terms of events and developments that may affect the value of the capital market instrument, affect the investment decisions of investors or exercise their rights due to Arzum's financial situation and activities. While making this evaluation, the Investor Relations Department considers the data transmitted to the department and also the conditions specific to Arzum, and while evaluating the value of the capital market instrument, its price and whether it will have an impact on the investment decisions of the investors, the department proceeds by examining each case separately and agreeing with the Deputy General Manager of Financial Affairs.
- 7.1.5. In cases where the disclosure of internal information adversely affects Arzum's legitimate interests, Arzum has the right to postpone the disclosure, provided that the conditions specified in the Communiqué on Material Events Disclosure (No II-15.1) and Directive are met. Arzum takes all necessary precautions to keep the internal information within the scope of postponement confidential. As soon as the reasons for postponing the public disclosure of such internal information are eliminated, Arzum discloses such internal information to the public in accordance with the principles written in the relevant communiqués. In the statement to be made, the decision to postpone and the reasons behind it are specified. In the process of deferred disclosure, if rumors arise about the deferred information or if some details are disclosed to the public in any way, due to the fault of the persons responsible for keeping the information confidential, the confidentiality of the deferred information is removed. In this case, Arzum makes a public statement immediately, since the confidentiality of the information cannot be protected.

### **7.2. Preparation of the Public Disclosure Document**

- 7.2.1. Explanations/notifications regarding inside information are prepared by filling in all fields of the relevant forms in the PDP. The fields related to the elements in the relevant form but not yet finalized are filled in as "Not finalized yet." form and when it is finalized, the same form is used and a notification is made over the PDP again.
- 7.2.2. In the disclosure of internal information to the public, all necessary details are included in the disclosure to ensure the correct evaluation of the disclosure. In special cases that are uncertain due to an event or conditions that are not yet finalized, the estimated date when this uncertainty will be resolved as well as the conditions required for its resolution are specified.

- 7.2.3. In case of any developments or changes in the special circumstances disclosures made previously, the statement is updated and announced to the public.

### **7.3. Issuing the Public Disclosure Document**

- 7.3.1. According to the nature of the internal information, the public disclosure document prepared with the consent of the content provider unit is approved by the Investor Relations Manager at the Public Disclosure Platform, upon the approval of the Assistant General Manager of Financial Affairs.
- 7.3.2. The Investor Relations Department immediately makes public disclosures using the Public Disclosure Platform formats, unless otherwise stated in the communiqué.
- 7.3.3. When incorrect information is published, this should be corrected immediately with a new statement. Corrections are repeated by using the relevant form in PDP, with a title stating that the statement is a correction statement and by answering the questions taking place in the relevant form.
- 7.3.4. The language of all public disclosure statements is Turkish. However, in cases where the statements are required to be published simultaneously in English as well as in Turkish, within the framework of the CMB legislation and the regulations of the Board on corporate governance, a statement is made in both languages.
- 7.3.5. The Investor Relations Department announces special circumstances disclosures on the Investor Relations page of the website specified in the PDP, at the latest, within the business day following the public disclosure, and is obliged to keep such disclosures on the website for the period specified in the communiqué.

## **8. ENFORCEMENT:**

- 8.1. This procedure comes into force upon the approval of the Board of Directors.