OYAK CIMENTO FABRIKALARI A.S.

DISCLOSURE POLICY

I. Purpose and Scope

The purpose of OYAK Çimento Fabrikaları A.S Information Policy is to ensure continuous, effective, and transparent communication by sharing all kinds of information that are not trade secrets, reflecting the company's past performance and future expectations, in a complete, fair, accurate, timely, understandable, and easily accessible manner equally with all stakeholders such as domestic/foreign shareholders, potential investors, employees, customers, and relevant authorized institutions, within the framework of Capital Markets Legislation provisions, Corporate Governance Principles, and the company's Articles of Association.

The Company's disclosure policy is carried out in compliance with the provisions of the Capital Markets Legislation, decisions of the Capital Markets Board, and other relevant regulations. Accordingly, matters required to be disclosed are announced to the public completely, accurately, and timely.

The Disclosure Policy covers all employees operating within OYAK Çimento Fabrikaları AŞ.

II. Authority and Responsibility

The Company's Disclosure Policy is created and implemented under the authority of the Board of Directors. The Board of Directors reserves the right to amend this policy from time to time as required by relevant regulations. The Information Policy and any amendments made to it are published on the Company's website following the approval of the Board of Directors.

The Investor Relations Department, General Manager, and Financial Affairs Directorate are responsible for overseeing and monitoring this Information Policy.

All written and visual press releases within the scope of this Policy are announced to the public by Company officials consisting of the Chairman of the Board and/or General Manager, Financial Affairs Manager, and Investor Relations Department Manager.

Disclosure of forward-looking statements is subject to the provision of Article 10/a of the Capital Markets Board's Communiqué on Special Cases (II-15.1), which states: "Forward-looking statement may be disclosed to the public, provided they are approved in writing by the board of directors or, if authorized, by the authorized person."

III. Methods and Tools of Disclosure

Within the framework of this Disclosure Policy, the disclosure methods and tools used by our Company are as follows:

- Periodic financial statements, independent auditor reports, and declarations submitted to the Public Disclosure Platform (KAP)
- Annual Activity Reports
- Company website
- Material event disclosure forms
- Announcements and notices via Trade Registry Gazette and daily newspapers
- Communication methods such as telephone, email, and fax

IV. Principles Regarding Presentations and Reports Disclosed at Information or Press Meetings

Information requests from shareholders, investors, and analysts directed to the Company are responded to by the Investor Relations Department in a correct, complete, and equitable manner within the framework of publicly disclosed information, either in writing, verbally, or through information meetings.

Material event disclosures, including forward-looking statements, may also be announced through media outlets, press conferences and/or press releases, or other communication channels. Such announcements are also made on the Public Disclosure Platform (KAP) either prior to or simultaneously and are additionally published on the Company's website.

Company officials may participate in national and international conferences or meetings from time to time to share information with investors and analysts. Presentations used at these events may also be published on the Company's website.

V. Principles for Monitoring News and Rumors about the Company in Media and Internet Sites and Making Related Statements

The Company monitors news and rumors appearing in national or international media outlets or other communication channels through a media monitoring company and a data distribution company. In the event of the existence of news or rumors that are either announced to the public for the first time or differ from previously disclosed information, the Company evaluates their potential impact on the value, price of the Company's shares, or on investors' investment decisions within the framework of internal company regulations. If deemed necessary, even if a postponement decision has been made, a public disclosure is promptly made in accordance with the principles stipulated in the capital markets legislation regarding whether such information is accurate or sufficient.

The Company may choose to make statements regarding news and rumors appearing in the media that do not trigger an obligation to make a material event disclosure. Such statements may be communicated to the press either in written or verbal form and may also be publicly announced via the Company's website (www.oyakcimento.com).

Regarding comments, analyses, evaluations, and forecasts made through media outlets and other communication channels based on publicly disclosed information, the Company is not obligated to make any public disclosure about their adequacy or accuracy.

VI. Measures Taken to Ensure Confidentiality Until the Disclosure of Materials Events to Public

Company executives and their spouses, children, or individuals living in the same household are prohibited from trading in the Company's shares or capital market instruments based on these shares during the period from the end of the fiscal period for which the financial statements and reports prepared by the Company and independent audit reports are finalized until these statements and reports are publicly disclosed in accordance with legislation. This prohibition also applies to executives of the Company's subsidiaries and parent companies, as well as persons who have inside or continuous information due to their shareholding in the Company or its subsidiaries and parent companies.

The Company may postpone the public disclosure of inside information, provided that it can protect the confidentiality of such information and prevent misleading investors, so as not to harm its legitimate interests. In such cases, the Company takes all necessary measures to ensure the confidentiality of inside information in accordance with capital markets legislation.

The Company informs its executives and employees through in-service training about the legal obligations regarding inside information and the sanctions related to misuse or dissemination of such information under the law and related legislation. The Company takes necessary measures, including obtaining confidentiality undertakings and similar methods, to prevent access to inside information by employees not listed among those with access to inside information and third parties providing services.

People with access to inside information are informed in writing, against signature, to ensure their acceptance of the legal obligations regarding inside information and the sanctions related to its misuse or dissemination.

VII. Principles Used in Determining Persons with Administrative Responsibility

Within the framework of Capital Markets Legislation, "Persons with Administrative Responsibility" are defined as members of the Company's Board of Directors, as well as individuals who are not board members but have regular direct or indirect access to the issuers inside information and have the authority to make administrative decisions that affect the issuer’s future development and commercial objectives.

At our Company, Persons with Administrative Responsibility are identified as the Members of the Board of Directors, General Manager, Chief Financial Officer, and other Managers and Executives.

VIII. Principles Regarding Disclosure of Forward-Looking Statements

Evaluations containing plans and forecasts that qualify as insider information about the future, or that provide investors with insights into the issuer’s future activities, financial condition, and performance, may be disclosed to the public in accordance with the principles set forth in the capital markets legislation.

Forward-looking statements are based on reasonable assumptions and estimates, and in the event of deviations due to unforeseen risks and developments, or if there is a significant difference between previously disclosed information and actual outcomes, the reasons for such differences shall also be disclosed publicly.

Forward-looking statements may be made not only through special circumstance disclosures, but also by utilizing press and media outlets, press conferences, press releases, national and international conferences or meetings, and other communication channels, within the framework of the principles of capital markets legislation.

All questions regarding the implementation principles and procedures of this policy should be directed to the Investor Relations Department.

Note: This document has been translated into English for informational purposes. In case of a discrepancy between the Turkish and the English versions of this disclosure statement, the Turkish version shall prevail.