

EBEBEK MAĞAZACILIK ANONİM ŞİRKETİ DISCLOSURE POLICY

The Board of Directors of EBEBEK Mağazacılık A.Ş. has approved the disclosure policy set forth below.

1. PURPOSE

The purpose of the Disclosure Policy is to ensure that information and disclosures which are legally required to be announced or have become eligible for disclosure, pursuant to the Turkish Commercial Code No. 6102 ("TCC"), the Capital Markets Law No. 6362, the Capital Markets Board ("CMB") Communiqué on Material Events Disclosure (II-15.1) ("Material Events Communiqué"), the Communiqué on Corporate Governance (II-17.1), and other capital markets legislation, are shared with the public as well as current and potential investors in an accurate, timely, equal, and effective manner.

2. RESPONSIBILITY

The Board of Directors of the Company is responsible for establishing the Disclosure Policy and making necessary updates. The Disclosure Policy approved by the Board of Directors ("Disclosure Policy") is disclosed to the public via the Company's corporate website. The Investor Relations Department is responsible for overseeing and monitoring all matters relating to the Disclosure Policy.

3. DISCLOSURE TOOLS

For the purpose of public disclosure and information, the Company utilizes the following tools:

- a. Material event disclosures, financial reports, and the Company General Information Form published on the Public Disclosure Platform ("PDP"); the Committee reviews risk management systems at least once a year.
- b. The Investor Relations section of the Company's corporate website.
- c. Prospectuses, circulars, announcements, and other documents required to be prepared under capital markets legislation.
- d. Announcements and notices made through the Turkish Trade Registry Gazette ("TTSG") and, when deemed necessary, daily newspapers.
- e. General Assembly meetings
- f. Press releases made by the Company through written, visual, and social media channels
- g. Information and promotional documents prepared for investors; corporate presentations introducing the Company
- h. e-Şirket and e-GKS platforms of MKK

Without being limited to the foregoing, the Company may also utilize other communication tools permitted by legislation in its communication with investors.

4. PRINCIPLES REGARDING THE MONITORING OF NEWS AND RUMORS IN THE MEDIA OR ON INTERNET SITES AND MAKING RELATED DISCLOSURES

The Company is responsible for monitoring news and rumors appearing in media outlets or on internet sites concerning the Company. In making disclosures regarding such news and rumors, the provisions of the Material Events Communiqué and other applicable legislation are complied with.

5. DISCLOSURE OF FORWARD-LOOKING STATEMENTS

In the event that Company officials wish to disclose forward-looking statements to the public, the principles set forth in the applicable legislation are followed.

6. RESPONDING TO WRITTEN INFORMATION REQUESTS

The Company's Investor Relations Department is responsible for responding to written information requests from shareholders, except for information that has not been publicly disclosed or that constitutes trade secrets. In accordance with applicable legislation, the Company responds in writing to information requests from investors via the email address yatirimci.iliskileri@ebebek.com.tr

7. PRESENTATIONS AND REPORTS DISCLOSED AT INVESTOR INFORMATION MEETINGS OR PRESS CONFERENCES

In order to ensure that stakeholders are informed equally and effectively, the Company may, when deemed necessary, organize investor information meetings or press conferences, during which presentations and reports may be disclosed. If such presentations and reports contain inside information, they are simultaneously published on the Public Disclosure Platform (PDP) and the Company's corporate website.

8. PROTECTION OF INSIDE INFORMATION CONFIDENTIALITY

The Board of Directors establishes effective arrangements and takes all necessary measures, including the use of all available technical means when required, to ensure the confidentiality of inside information and other material events that may affect the value of the Company's capital market instruments or the investment decisions of investors but have not yet been publicly disclosed.

The Company also takes necessary steps, in accordance with legislation, to ensure that persons who have access to inside information are made aware of their legal obligations regarding such information and of the sanctions applicable to its misuse. Pursuant to Article 7 of the Material Events Communiqué, the Company prepares a list of persons who have access to inside information and notifies the Central Securities Depository (MKK). In the event of any changes, the list is updated within the period stipulated by legislation.

9. PRINCIPLES REGARDING THE DETERMINATION OF PERSONS WITH ADMINISTRATIVE RESPONSIBILITY

In addition to the members of the Board of Directors, persons who, directly or indirectly, have regular access to the Company's inside information and who have the authority to make administrative decisions that affect the Company's future development and commercial

objectives are deemed as “Persons with Administrative Responsibility.” These individuals are identified by the Investor Relations Department, taking into account the Company’s organizational structure and the job descriptions of the positions.

Pursuant to Article 11 of the Material Events Communiqué, transactions carried out by persons with administrative responsibility within the Company, persons closely associated with them, and the Company’s principal shareholder, in relation to shares representing the capital or other capital market instruments based on such shares, are publicly disclosed in accordance with the principles set out in the said communiqué.

10. BLACKOUT PERIOD APPLICATION

The Company implements a “Blackout Period” during which Persons with Access to Inside Information are prohibited from trading the Company’s shares prior to the public disclosure of financial statements. Accordingly, Persons with Access to Inside Information may not trade Company shares during the following periods:

- a. From January 1 until the day following the public disclosure of the year-end financial statements, and
- b. From July 1 until the end of the day following the public disclosure of the semi-annual financial statements.