

ÇİMENTAŞ İZMİR ÇİMENTO FABRİKASI TÜRK A.Ş

DISCLOSURE POLICY

I- Purpose and Scope

Çimentaş has prepared a Disclosure Policy in order to provide simultaneous, complete and accurate information to its shareholders, investors, market specialists and interest owners based on the principles of transparency and honesty in accordance with the Capital Market Legislation which it is subject to, Regulations of Capital Market Board and Regulations of Borsa Istanbul (“BIST”) and Corporate Governance Principles of CMB. Within this scope, the Company may postpone and/or refrain from disclosing some specific information to the public for the cases which the disclosure may damage the interests.

The Disclosure Policy of Çimentaş is prepared by the Board of Directors and is submitted to the Public and shareholders, investors, market specialists and interest owners’ information..

II- Responsibility

The Board of Directors is responsible for reviewing and developing the Disclosure Policy. At the end of each year, Disclosure Policy is reviewed by the Board of Directors, in case of a need of change, changes to be made are published on the web site of the company upon the approval of the Board of Directors and thus announced to the Public.

Financial Affairs Directorate is responsible for monitoring the Disclosure Policy and its practices.

III- Disclosure Methods & Tools

Reserving the provisions of Capital Market Legislation and Turkish Commercial Code (TCC), applied basic public disclosure methods and tools are as follows;

- Disclosures of special events in Public Disclosure Platform (“KAP”),
- Financial statements and footnotes, independent audit report, declarations and annual report that are announced in KAP,
- Notices and announcements done via Turkish Trade Registry Gazette and daily newspapers. (The prospectus, circular, General Assembly calls etc.),
- Press releases done via written and visual media and data distribution organizations,

- Insider trading,
- Corporate web-site,

IV- Principles Related to Public Disclosures

a) Disclosure of Internal Information

Within the scope of the Disclosure Policy, “Internal Information” is the information not yet disclosed to the public which may affect the value of securities issued by the Company and investors’ decisions who are the owner of these securities.

Taking into consideration the Regulations of the Capital Market Law, KAP announcements are done and published on the Company’s web-site.

b) Postponement of the Disclosure of Internal Information to the Public

The Company, at its own responsibility, in order to prevent damage to its interests, may postpone the disclosure of the internal information to the Public that it deems necessary provided that the subject internal information should be kept confidential.

The postponement of the Public disclosure of internal information is subject to the approval of either the Board of Directors or the person authorized in writing by the Board of Directors. The reasoned explanation of the postponement should be stated.

In case the confidentiality of the internal informal cannot be kept, the subject information is disclosed.

V- Periodic Reports and Financial Statements

In accordance with the regulations of Capital Market Board and BIST, annual and periodic activity reports, financial statements & disclosures and independent audit reports are announced in KAP within the prescribed time in the legislation.

VI- News Announcements

Explanations on the Public Disclosure of information are announced by the Company according to the above principles. However, if deemed necessary by the Company’s Board of Directors, announcements and advertisements are made as special event disclosure firstly. Subsequently, it is published via newspaper and kept on the web-site.

VII- Press Releases via Written and Visual Media

The press interviews of the Chairman of the Board of Directors or authorized persons are made by informing the members of the Board of Directors together with obtaining the opinion of Financial Affairs Director and Legal Affairs Manager, in the event that the issues that could significantly affect the value of the stock are in subject.

Only the persons authorized to make public disclosure can make a statement to the press and the media.

VIII- Insider Trading

A policy of insider trading is rendered within the Company taking into consideration the members of the Board of Directors, managers and employees. In line with this policy, based on the security of the company's trade secrets, obligations to be complied with are as follows;

- a) Abstaining from disclosure of trade secret information by unauthorized persons,
- b) Warning those who have this information, not to purchase and sell goods, to monitor those who can, and not to give advice on buy-sell to the real and legal persons outside the Company,

Upon the completion of the creating the insider trading policy within the Company, the said policy is reviewed periodically according to changing conditions. Its scope is updated.

IX- Corporate Web-Site

Çimentaş uses its web-site actively in providing transparency that underlies Corporate Governance Principles.

Important topics which can be viewed on the website;

- Information on corporate identity,
- Ideal and the main strategies of the Company,
- Information on Board of Directors, Senior Management and the auditors,
- Company organization and ownership structure,
- Articles of Association,
- Information on Commercial register and Chamber of Commerce registration.

- Special Event disclosures,
- Press releases,
- Last 5-year annual reports,
- Last 5-year List of Attendants,
- Last 5-year minutes of the annual General Assembly Meeting,
- Table of Capital increases and resources,
- Disclosure Policy,

X- Persons Authorized to Make Public Disclosure

Any demand of information and reports and written and oral questions which does not hold the nature of trade secret and are in the context of disclosed periodic information regarding the corporate actions and financial position, are responded by Financial Affairs Directorate.

Persons who are authorized to make special event disclosure are the authorized signatories assigned by the Board of Directors in accordance with the Company's authorized signatory list. The declarations via written or visual media, or data distribution channels can only be made by the Chairman or Vice Chairman. Taking into consideration the characteristics of of the declaration, Chairman may assign the Managing Director or any other relevant director. In such cases, the declaration is made by the assigned person.

In case a declaration is deemed necessary regarding the news and rumors published on press and publications, which does not create any liability to make a public disclosure, this declaration is made by the Chairman or the person assigned, via press or through web-site.

In case a verification liability regarding the news published on press and publications is sought by Capital Market Board or BIST, 1st or 2nd provisions are applied.