



KAMUYU AYDINLATMA PLATFORMU

BİM BİRLEŞİK MAĞAZALAR A.Ş. Material Event Disclosure (General)

Summary

Announcement regarding the Competition Authority's decision

Material Event Disclosure General

Related Companies []

Related Funds []

Material Event Disclosure General	
Update Notification Flag	Hayır (No)
Correction Notification Flag	Hayır (No)
Date Of The Previous Notification About The Same Subject	-
Postponed Notification Flag	Evet (Yes)
Announcement Content	
Explanations	

The Competition Authority has imposed an administrative fine of 1,295,902,606.94 TL on our Company pursuant to Article 16, paragraph 1(d) of Law No. 4054.

If the administrative fine is applied with a 25% reduction in accordance with Article 17, paragraph 6 of Law No. 5326, the fine amount will be 971,926,955.21 TL.

The decision notified to our Company does not constitute a reasoned decision, and the details regarding the grounds for the fine have not yet been communicated to us. Within the scope of Article 6 of the Capital Markets Board's Communiqué II-15.1 on Material Events, BİM Board of Directors decided on 11.02.2025 to postpone the disclosure of a material event statement and the fulfillment of our Company's public disclosure obligations until the reasoned decision is received due to

- 1) The lack of sufficient information to properly inform investors and the public,
- 2) The risk that any statement made with the available information could lead to speculation, potentially harming both investors and our Company,
- 3) The fact that the administrative legal process will be available from the date of notification of the reasoned decision, and that it is not possible to determine a legal roadmap without receiving the reasoned decision.

Additionally, the same Board decision stated that if, despite all the measures taken within our control, the Competition Authority publishes the reasoned decision on its website before officially notifying us—contrary to Articles 52 and 53 of Law No. 4054 on the Protection of Competition—or if any real or legal entity, domestically or internationally, discloses it to the public, the postponement conditions will cease to exist, and a material event statement will be made immediately upon such disclosure.

The announcement regarding the administrative fine was made in an unconventional manner on the website "haber.rekabet.gov.tr", which is not the official website of the Competition Authority but is stated to be affiliated with it, as well as on its related social media accounts under the headline "Blocking an On-Site Inspection Can Have Severe Consequences – BİM Fined 1.3 Billion TL." Subsequently, on the same day (19.02.2025), the news was widely circulated across all media outlets. The announcement of the administrative fine, made before our Company received the reasoned

decision and while our right to appeal under administrative litigation procedures remains intact, is contrary to the established practices and methods of the institution. Therefore, we find it necessary to issue this statement.

Although the reasoned decision has not yet been delivered to our Company, statements in the news suggest that the fine was imposed due to the deletion of messages from a messaging application on the personal phone of an employee who was on leave for health reasons during the investigation. This employee held a position that did not influence Company decisions.

Despite the fact that these messages were recovered and contained no content violating competition law, the imposed fine is unjust. Furthermore, none of our Company's records, none of our executives' communications, nor any applications contain any statements or actions that could justify such a penalty.

Our Company is highly committed to transparency, accountability, and adherence to competition principles with utmost diligence and discipline. The individual action of this employee is in no way accepted or condoned by our Company, and as a result, their employment contract was immediately terminated.

Once the reasoned decision is officially notified to us, all necessary legal actions will be taken against the decision.

Respectfully submitted to the public.

In case of a discrepancy between the Turkish and English versions of this public disclosure statement, Turkish version shall prevail.

We proclaim that our above disclosure is in conformity with the principles set down in “Material Events Communiqué” of Capital Markets Board, and it fully reflects all information coming to our knowledge on the subject matter thereof, and it is in conformity with our books, records and documents, and all reasonable efforts have been shown by our Company in order to obtain all information fully and accurately about the subject matter thereof, and we’re personally liable for the disclosures.