

HEKTAŞ TİCARET TÜRK ANONİM ŞİRKETİ

DISCLOSURE POLICY AMENDMENT TEXT

CURRENT VERSION	NEW VERSION
<p>DISCLOSURE POLICY</p> <p>I- Purpose and Scope</p> <p>The purpose of the Disclosure Policy of Hektaş Ticaret T.A.Ş. ("Hektaş") is to ensure continuous, effective, and transparent communication by sharing all non-confidential information, the company's past performance, and future expectations in a complete, fair, accurate, timely, understandable, and easily accessible manner with all stakeholders, such as local/foreign shareholders, potential investors, employees, customers, and relevant authorities, in an equal manner in accordance with the provisions of the Capital Markets Legislation, Corporate Governance Principles, and the Company's Articles of Association.</p> <p>The Company's information policy is carried out in accordance with the provisions of the Capital Markets Legislation, decisions of the Capital Markets Board, and other relevant regulations. In this framework, the matters to be disclosed are announced to the public in a timely, complete, and accurate manner.</p> <p>The Information Policy covers all employees operating within Hektaş.</p> <p>II- Authority and Responsibility</p> <p>The Company's Information Policy is established and implemented under the authority of the Board of Directors. The Board of Directors reserves the right to make changes to this policy from time to time, as required by the relevant regulations. The Information Policy and any changes made to the policy are published on the Company's website following the approval of the Board of Directors.</p> <p>The responsibility for overseeing and monitoring this Information Policy lies with our Company's Investor Relations Department.</p> <p>Under this policy, all written and visual press releases will be announced to the public by the Company officials, consisting of the Chairman of the Board of Directors, the General Manager, Deputy General Managers, and the Manager of the Investor Relations Department.</p> <p>The provision of the Capital Markets Board (CMB) Communiqué II-15.1 on Material Events, Article 10/a: "Forward-looking statements may be disclosed to the public, provided that they are subject to the written approval of the Board of Directors or, if authorized, the person authorized by the Board of Directors," is reserved.</p>	<p>DISCLOSURE POLICY</p> <p>I- Purpose and Scope</p> <p>The purpose of the Disclosure Policy of HEKTAŞ Ticaret T.A.Ş. ("HEKTAŞ") is to ensure continuous, effective, and transparent communication by sharing all non-confidential information, the company's past performance, and future expectations in a complete, fair, accurate, timely, understandable, and easily accessible manner with all stakeholders, such as local/foreign shareholders, potential investors, employees, customers, and relevant authorities, in an equal manner in accordance with the provisions of the Capital Markets Legislation, Corporate Governance Principles, and the Company's Articles of Association.</p> <p>The Company's information policy is carried out in accordance with the provisions of the Capital Markets Legislation, decisions of the Capital Markets Board, and other relevant regulations. In this framework, the matters to be disclosed are announced to the public in a timely, complete, and accurate manner.</p> <p>The Information Policy covers all employees operating within Hektaş.</p> <p>II- Authority and Responsibility</p> <p>In accordance with the Corporate Governance Principles of the CMB, 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 make changes to this policy from time to time, as required by the relevant regulations. The disclosure policy and any amendments to the policy are disclosed to the public on the Public Disclosure Platform (KAP) and the Company's corporate website (www.hektas.com) following the approval of the Board of Directors.</p> <p>The responsibility for overseeing and monitoring this Information Policy lies with Company Investor Relations Department.</p> <p>All written and visual press releases to be made under this policy are announced to the public by the Company officials, consisting of the Board of Directors, the General Manager, Directors and the Manager of the Investor Relations Department.</p> <p>The provision of the Capital Markets Board (CMB) Communiqué II-15.1 on Material Events, Article 10/a: "Forward-looking statements may be disclosed to the public, provided that they are subject to the written approval of the Board of Directors or, if authorized,</p>

III- Information Methods and Tools

The methods and tools used by ~~our Company~~ for disclosure under this Disclosure Policy are outlined below.

-Financial statements, independent auditor reports, and statements periodically submitted to the Public Disclosure Platform (KAP)
-Annual Activity Reports

-Company Website
-Material event disclosure forms
-Announcements and notices made through the Trade Registry Gazette and daily newspapers
-Communication methods via telephone, email, fax, and other communication tools

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

Information requests from ~~shareholders, investors,~~ and analysts are answered by the Investor Relations ~~Department~~—in writing, verbally, or through informational meetings, ensuring accuracy, completeness, and adherence to the principle of equality, within the framework of publicly disclosed information.

In the disclosure of matters subject to material events, including forward-looking statements, media outlets, press conferences and/or press releases, or other communication channels may ~~also~~ be utilized. ~~Prior to or simultaneously with these announcements, disclosures are made on the Public Disclosure Platform (KAP), and they are also published on the Company's website.~~ Company officials may, from time to time, participate in conferences or meetings at the national and international level to share information with investors and analysts. Presentations used at these events ~~may~~ also be published on the Company's website.

V- Principles Regarding the Monitoring of News and Rumors About the Company in Media Outlets or Websites and the Disclosure of Related Statements

The Company monitors news and rumors in national or international media outlets or other communication channels through a media monitoring company. In the event of the existence of news or rumors that are either newly disclosed to the public or differ from previously disclosed information, the Company evaluates their potential impact on the value, price of its shares, or the investment decisions

the person authorized by the Board of Directors," is reserved.

III- Information Methods and Tools

The methods and tools used by Company for disclosure under this Disclosure Policy are outlined below.

Financial statements, independent auditor reports, and statements periodically submitted to the Public Disclosure Platform (KAP)
-Annual Activity Reports

– Investor Presentation Files
-Company Website
-Material event disclosure forms
-Announcements and notices made through the Trade Registry Gazette and daily newspapers
-Communication methods via telephone, email, fax, and other communication tools

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

Unless otherwise stated in the Disclosure Policy, only individuals authorized to make public statements on behalf of HEKTAŞ Ticaret Türk A.Ş. may communicate with capital market participants.

Requests for information from analysts are answered by the Investor Relations **Unit**, in accordance with publicly disclosed information, ensuring accuracy, completeness, and adherence to the principle of equality, through written or verbal responses or information meetings.

For matters subject to special situations, including forward-looking evaluations, press and media outlets, press conferences and/or press releases, or other communication channels may also be utilized to disclose information to the public.

Company officials may occasionally participate in conferences or meetings at the national and international levels to share information with investment **institutions** and analysts. The presentations used in these events **are also published** on the Company's website in both **Turkish and English**.

V- Principles Regarding the Monitoring of News and Rumors About the Company in Media Outlets or Websites and the Disclosure of Related Statements

The Company follows news and rumors appearing in national or international media outlets or other communication channels through a media monitoring company. In the presence of news or rumors that differ from the information first disclosed to the public or previously disclosed information, the Company evaluates the potential impact on the value, price of the shares, or investors' investment

of investors within the framework of internal regulations. If deemed necessary, even if a postponement decision is made, an immediate disclosure is made to the public in accordance with the principles set out in the capital markets legislation, regarding whether the information is accurate or sufficient.

The Company may choose to make a statement regarding news and rumors published in media outlets that do not trigger an obligation for a material event disclosure. These statements may be communicated to the public through written or verbal communication with the press, or they may be announced via the Company's website (www.hektas.com.tr).

The Company is not obligated to make a public disclosure regarding the adequacy and accuracy of comments, analyses, assessments, and forecasts made based on publicly disclosed information through media outlets and other communication channels.

VI- Measures Taken to Ensure Confidentiality Until the Public Disclosure of Material Events

Company executives, 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, from the day following the end of the financial period for which the financial statements and independent audit reports are prepared, until the public disclosure of these statements and reports in accordance with the regulations. The prohibition also applies to the managers of the Company's affiliated and controlling subsidiaries, as well as individuals who possess insider information or continuous information due to their shareholding in the Company or its affiliated and controlling subsidiaries.

The Company may delay the public disclosure of insider information, provided that it can ensure that the release of such information does not mislead investors and that the information remains confidential, in order to protect its legitimate interests. In such cases, the Company takes all necessary measures to ensure the confidentiality of insider information, in accordance with capital markets legislation.

The Company informs its executives and employees, through in-house training programs, about the obligations outlined in the laws and relevant regulations regarding insider information, as well as the sanctions related to the misuse or dissemination

decisions within the framework of its internal regulations. If deemed necessary, the Company will make a public disclosure in accordance with the principles set out in capital markets legislation, even if a postponement decision has been made, to assess whether the information is accurate or sufficient.

The Company may choose to make a statement regarding news and rumors published in media outlets that do not trigger an obligation for a material event disclosure. These statements may be communicated to the public through written or verbal communication with the press, or they may be announced via the Company's website (www.hektas.com.tr).

The Company is not obligated to make a public disclosure regarding the adequacy and accuracy of comments, analyses, assessments, and forecasts made based on publicly disclosed information through media outlets and other communication channels.

VI- Measures Taken to Ensure Confidentiality Until the Public Disclosure of Material Events

Company executives, 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, from the day following the end of the financial period for which the financial statements and independent audit reports are prepared, until the public disclosure of these statements and reports in accordance with the regulations. Individuals who hold shares in the Company and its subsidiaries or **controlling** affiliates, due to their positions as managers in the Company or its subsidiaries and **controlling** affiliates, and who have access to inside information or ongoing information, are also subject to this prohibition.

The Company may delay the public disclosure of insider information, provided that it can ensure that the release of such information does not mislead investors and that the information remains confidential, in order to protect its legitimate interests. In such cases, the Company takes all necessary measures to ensure the confidentiality of insider information, in accordance with capital markets legislation.

The Company informs its executives and employees, through in-house training programs, about the obligations outlined in the laws and relevant regulations regarding insider information, as well as the sanctions related to the misuse or dissemination of such information. The Company takes the

of such information. The Company takes the necessary measures, such as obtaining confidentiality agreements from employees not listed as having access to insider information and third-party service providers, to prevent unauthorized access to such information.

Individuals with access to insider information are informed in writing, against signature, about the obligations outlined in the laws and relevant regulations regarding such information, as well as the sanctions related to the misuse or dissemination of these details.

VII- Principles Used in the Identification of Individuals with Administrative Responsibility

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

~~In our company, the individuals identified with administrative responsibility are the Board of Directors members, CEO, Deputy CEOs, Accounting and Budget Manager, Finance Manager, Domestic Sales Manager, Purchasing Manager, Human Resources Manager, R&D and Quality Control Manager, Production Manager, International Sales Manager, Plant Protection R&D Manager, Information Technology Manager, Animal Health Licensing and R&D Manager, Project and Maintenance Manager, Logistics Manager, Product Manager, Commercial Marketing Manager, and Human Resources and Quality Systems Coordinator.~~

VIII- Principles Regarding the Disclosure of Forward-Looking Statements

Forward-looking statements containing internal information, including plans and forecasts, or assessments that provide investors with insights into the issuer's future activities, financial condition, and performance, may be disclosed to the public within the framework of the principles set forth in the Capital Markets Legislation.

Forward-looking statements are based on reasonable assumptions and forecasts. In the event of deviations due to unforeseen risks and developments, and if there is a significant difference between previously disclosed information and actual outcomes, an

necessary measures, such as obtaining confidentiality agreements from employees not listed as having access to insider information and third-party service providers, to prevent unauthorized access to such information.

Individuals with access to insider information are informed in writing, against signature, about the obligations outlined in the laws and relevant regulations regarding such information, as well as the sanctions related to the misuse or dissemination of these details.

VII- Principles Used in the Identification of Individuals with Administrative Responsibility

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

The people with administrative responsibilities are the Board of Directors, the General Manager, and the Directors.

VIII- Principles Regarding the Disclosure of Forward-Looking Statements

Forward-looking statements containing internal information, including plans and forecasts, or assessments that provide investors with insights into the issuer's future activities, financial condition, and performance, may be disclosed to the public within the framework of the principles set forth in the Capital Markets Legislation. **The disclosure of forward-looking statements to the public is not mandatory but is discretionary.**

Forward-looking statements are based on reasonable assumptions and forecasts. In the event of deviations due to unforeseen risks and developments, and if there is a significant difference between previously disclosed information and actual outcomes, an

explanation is provided to the public, including the reasons for these discrepancies.

The Chairman of the Board of Directors and the CEO are authorized by the Company's Board of Directors to disclose the Company's forward-looking assessments.

Forward-looking statements, within the framework of the principles set forth in the Capital Markets Legislation, may be disclosed through material event disclosures, as well as through media outlets, press conferences, press releases, conferences or meetings at national and international levels, and other communication channels.

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

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