

## ARÇELİK A.Ş. DISCLOSURE POLICY

### 1. PURPOSE AND SCOPE

Arçelik A.Ş. ("Arçelik") Disclosure Policy aims to determine the methods and principles that Arçelik will use to share information and developments that may affect the price of its shares or investor decisions, including its past activities and financial performance and forward-looking assessments, excluding those that are trade secrets, in a timely, accurate, complete, direct, understandable, adequate and easily accessible manner in accordance with the principle of equal treatment, in a manner to respond to the regulations and expectations of stakeholders.

While Arçelik A.Ş. pursues an active and transparent disclosure policy, it complies with the applicable legislation, primarily the Turkish Commercial Code ("TCC"), Capital Markets Board ("CMB") and Borsa Istanbul A.Ş. ("BIST") regulations within the framework of Koç Group Ethical Principles in all public disclosure practices and aims to implement an effective disclosure policy.

### 2. METHODS AND TOOLS

#### 2.1. Authorized Persons to Make Statements

In principle, disclosures and information to be made on behalf of Arçelik A.Ş. within the framework of the above-mentioned purpose and scope are made by the Members of the Board of Directors, General Manager, Assistant General Managers or Executive Director of Finance&Enterprise Risk, Executive Director of Accounting, Executive Director of Global Communications, except for the forms, statements and reports signed in accordance with the signature circular.

In addition, the Investor Relations and Capital Market Legislation Compliance Department under the Finance and Corporate Risk Directorate under the Assistant General Manager of Finance and Accounting can communicate on behalf of Arçelik A.Ş. in promoting Arçelik A.Ş. before existing and potential investors and investment institutions and financial institutions in Turkey and abroad; meeting information requests, including those of analysts and financial experts working in these institutions, and responding to questions submitted to them within the scope of investor relations.

#### 2.2. Tools Used for Disclosure

Within the framework of CMB and BIST regulations and provisions of the Turkish Commercial Code, Arçelik A.Ş. may use the following communication methods and tools for public disclosure purposes:

- Material event disclosures announced on the Public Disclosure Platform ("PDP") and company general information form
- Financial statements, independent audit reports and annual reports disclosed on PDP
- Corporate Governance Compliance Report and Corporate Governance Information Form disclosed on PDP
- Corporate website ([www.arcelikglobal.com](http://www.arcelikglobal.com)) and corporate applications on digital platforms,
- Information and promotional documents prepared for investors; presentations introducing the company,
- Investor and analyst meetings; informational meetings and meetings with capital market participants, including those in the digital environment,
- Prospectus, circular, issue document, announcement texts and other documents required to be prepared in accordance with CMB regulations,
- Press releases made through print, visual and digital media,

- Central Registry Agency's e-Company and e-General Assembly System platforms,
- Announcements and notices made through the Turkish Trade Registry Gazette and daily newspapers.

Depending on the nature of the disclosure, only one of these methods and tools may be used, or more than one tool may be used when necessary.

### **2.3. Activities Conducted by the Investor Relations Unit**

At Arçelik A.Ş., the Investor Relations and Capital Markets Legislation Compliance Department carries out activities to maintain regular relations with existing and potential shareholders, analysts and capital market experts, to respond to the questions of investors and other capital market participants in the most efficient manner and to provide the necessary information for the company to reach the fair value of the capital market instruments traded in the financial markets. The Investor Relations and Capital Markets Legislation Compliance Department manages communication with shareholders and other stakeholders in order to avoid asymmetric distribution of information and to ensure that information is easily accessible, understandable, analyzable, timely and accurate.

The primary objective of the Investor Relations Unit is to ensure that the mutual relationship between the Company and investors is carried out in the most effective manner. In this context, the Investor Relations Unit acts as a bridge between the Company's senior management and investors. On the one hand, the Company's investment messages are communicated to investors; on the other hand, periodic reports are prepared to convey the evaluations and feedback received from investors to senior management. This ensures that the disclosure is bilateral.

#### **➤ Disclosure Meetings and Silent Period Implementation**

In order to ensure that Arçelik A.Ş.'s operational and financial performance; its vision, strategies and targets; and the added value created for its investors are explained and introduced to investors and analysts in the best way possible, Arçelik A.Ş. senior executives and Investor Relations Unit employees frequently meet with capital market participants such as brokerage houses, analysts and investors.

Employees of the Investor Relations Unit strive to meet all meeting requests received throughout the year and regularly participate in conferences and meetings organized in person or digitally in Turkey and abroad. It also organizes one-on-one information meetings with investors. From time to time, the General Manager, Assistant General Managers and CFO may also attend these meetings, thus making communication between existing and potential investors and senior management more effective.

Quarterly presentations of financial results are prepared to ensure effective financial communication with existing and potential investors.

Throughout the year, questions from investors and analysts are answered by organizing analyst meetings or teleconferences with the participation of the Executive Director of Investor Relations, Finance & Enterprise Risk, Assistant General Manager of Finance and Accounting or the General Manager.

When the date of announcement of the financial reports is finalized, Arçelik takes care to make a material event disclosure in the Financial Calendar and the date of disclosure is also announced through the Investor Calendar on the Company's corporate website.

Arçelik avoids discussing financial results and other related issues with capital market participants in certain periods of the calendar year in order to prevent asymmetric information distribution and sharing of information that is not yet finalized with the public. This period is called the "silent period". For Arçelik, the silent period starts on the 15th of the month following the end of the quarterly interim and annual accounting period and ends with the public disclosure of financial reports. The Financial Calendar material event disclosure includes

information about the period in which the Silent Period application is valid. The silent period start date in the aforementioned statement is essential.

Except for the information previously disclosed to the public during the Silent Period, no information is given about the financial status of the company. Meeting requests of analysts, investors and other capital market participants regarding the financial situation are not accepted and their questions on these issues are not answered. Without prejudice to the relevant CMB regulations, the "Silent Period" does not prevent the Authorized Persons to Make Disclosures from participating in conferences, forums and panels, and making speeches and announcements that do not contain financial guidance.

The dates of teleconferences and meetings that Arçelik A.Ş. will hold with analysts and investors in Turkey and/or abroad are disclosed to the public on Arçelik A.Ş.'s corporate website ([www.arcelikglobal.com](http://www.arcelikglobal.com)) for investors to follow. The investor presentation, which is updated quarterly and published on the website, is also used in these meetings. In addition, the teleconferences organized for the presentation of the financial results are held with wide participation via internet broadcasting and the transcripts of all details of the question and answer session are published on the investor relations website.

#### ➤ **Information and Promotional Documents**

While the Investor Relations Unit aims to inform investors in the best way possible through tools such as presentations, investor bulletins, summary information, website, annual report, teleconferences, investor meetings, corporate applications on digital platforms, etc.; it ensures that all these tools are prepared, published and updated in accordance with the legislation.

With the regularly updated website and the information notes made available to investors on the website, it is aimed to enable capital market participants to closely follow the developments regarding Arçelik and to access investor relations tools. Explanations on the content of annual reports and websites are provided in the relevant section below.

The list of analysts following Arçelik and their contact information is available for the information of investors in the investor relations section of Arçelik's corporate website and Arçelik A.Ş. has no authority or responsibility to review, verify or approve analyst reports or models.

#### ➤ **Information Requests**

The Investor Relations Unit responds to all kinds of questions, complaints, opinions and suggestions of shareholders, investors, analysts and other capital market stakeholders regarding the existing publicly disclosed information within the scope of this Policy or in the nature of evaluation of this information, directed by means such as telephone and e-mail for the purpose of effective use of the right to obtain information, as soon as possible and ensures that the information in the "Investor Relations" section of Arçelik A.Ş.'s website is disclosed on time and kept up-to-date.

#### ➤ **Website**

The "Investor Relations" section of Arçelik A.Ş.'s corporate website is dedicated to financial and non-financial information that current and potential investors and analysts may need in the valuation of company shares or in monitoring the performance of Arçelik A.Ş. and is actively used for public disclosure. The majority of the information on the website is prepared in Turkish and English and is continuously updated.

The Investor Relations Department is authorized and responsible for determining and managing the content of the investor relations website. This section serves as a platform for investors and analysts to view the detailed and comprehensive information they will need in valuing the company and monitoring the performance of the company and the stock.

The Investor Relations section of the Company's corporate website includes the information and documents required to be included within the scope of investor relations and information society services within the framework of the Turkish Commercial Code and Corporate Governance Principles, as well as Arçelik A.Ş.'s policies and practices such as "Dividend Distribution Policy", "Disclosure Policy", "Remuneration Policy" and "Arçelik Code of Ethics", analyses and evaluations; current information as well as historical information and statistics are also available on the website.

### **3. POLICIES ON DISCLOSURE OF MATERIAL EVENTS**

#### **3.1. Responsibility**

The Capital Markets Legislation Compliance Unit under the Finance Directorate under the chairmanship of the Assistant General Manager of Finance and Accounting is authorized and responsible for the fulfillment of Arçelik A.Ş. material event disclosure obligation, and this duty is fulfilled by ensuring the necessary coordination with the company units, especially the Legal Consultancy, Financial Affairs Directorate, Corporate Communications Directorate.

In principle, material event disclosures are made through the Public Disclosure Platform (PDP) in Turkish and English with the electronic certificates of the Assistant General Manager of Finance and Accounting and Senior Director of Finance. However, in the event that the electronic certificate of any of the Assistant General Manager of Finance and Accounting and Finance Director is not used, it is also possible to use the electronic certificates of other managers.

Following the disclosure of material event disclosure on PDP, the relevant disclosure is also published on the company website. The disclosures announced on PDP can also be accessed via the link on the corporate website.

#### **3.2. Persons with Administrative Responsibility**

The list of persons with administrative responsibility at Arçelik A.Ş. includes members of the board of directors of Arçelik A.Ş. and persons who, directly or indirectly, have regular access to insider information related to Arçelik A.Ş. and who are authorized to make administrative decisions affecting the future development and business objectives of Arçelik A.Ş. These persons, who have regular access to information and are also authorized to make administrative decisions, consist of the Company's General Manager and Assistant General Managers, as well as members of the board of directors and certain senior executives (CEO, CFO, relevant President, Directors, Chief Legal and Compliance Counsel and Secretary General) of Koç Holding, its parent company. Information about the persons with administrative responsibilities within the Company is announced on Arçelik A.Ş. website.

#### **3.3. Public Disclosure of Inside Information**

In all matters determined by the capital markets legislation and within the scope of the relevant legislation, Arçelik A.Ş. immediately discloses to the public via PDP, except in cases where public disclosure is postponed, in the event that a significant change occurs or becomes known in the activities, financial structures and management / capital relations of Arçelik A.Ş. as well as its non-publicly traded subsidiaries. Since the developments regarding the publicly traded subsidiaries are disclosed to the public by them, Arçelik A.Ş. does not make any further disclosures on these matters. Except for legal

obligations, the information disclosed to the public may not contain information that may hinder the competitive power of Koç Group and may have consequences that may cause damage to shareholders and other stakeholders. Trade secret information is not disclosed.

Investor Relations Unit and Corporate Communications Directorate may make a statement on the subject after the announcement of the disclosure in the PDP system.

### **3.4. Ensuring Confidentiality of Inside Information**

Arçelik A.Ş. employees who have inside information and other parties with whom Arçelik A.Ş. is in communication are informed in writing or by using electronic media in principle that they are obliged to protect the confidentiality of this information during the process of the occurrence of the material event and in the process that will pass from the occurrence of the material event until its disclosure.

As a general principle, Arçelik A.Ş. and those working for and on behalf of Arçelik A.Ş. cannot share information that has not yet been disclosed to the public and that may be considered as material events with third parties under any circumstances. If it is determined that inside information has been disclosed to third parties without being requested by these persons, a material event disclosure is made within the scope of CMB regulations, if it is concluded that the confidentiality of the information cannot be ensured.

If the disclosure of the information is postponed, the persons who have the information subject to the postponement at the time of the postponement decision are informed about the obligations in the regulations and the sanctions to be applied in case of breach of the said obligations. In addition, it is aimed to add a confidentiality clause to the contracts made with parties other than Arçelik A.Ş. and those working on behalf and account of Arçelik A.Ş., who have the information subject to postponement, and to take the necessary measures for the confidentiality of the information subject to postponement.

### **3.5. Postponement of Public Disclosure of Inside Information**

Arçelik A.Ş. may, at its own risk, postpone the public disclosure of inside information in order to prevent damage to its legitimate interests, provided that it does not mislead investors and can ensure that this information is kept confidential. In this case, Arçelik A.Ş. takes all possible measures to ensure the confidentiality of insider information in accordance with the capital markets legislation. In cases where the Board of Directors has not taken a special decision including the postponement of the information regarding the transaction subject to postponement, the General Manager authorized by the Board of Directors of Arçelik A.Ş., in consultation with the Assistant General Manager of Finance and Accounting, decides whether the disclosure of the information will be subject to postponement.

### **3.6. Fulfillment of the Verification Obligation**

Arçelik A.Ş. monitors news and content about Arçelik in major national media outlets, digital channels and social media platforms through a media monitoring agency contracted in Turkey. In this context, the news published every morning is directed to Arçelik Senior Executives, and every week to the Investor Relations Unit and Corporate Communications Unit.

In case there are news or rumors about Arçelik A.Ş. that may affect the value of capital market instruments or the decisions of investors, that are announced to the public for the first time through the press and media or other means of communication, or that have a different content than the information previously disclosed to the public, an explanation is made as to whether they are true or sufficient, if necessary, taking into account the following principles. Comments, analyses, assessments and estimates based on publicly disclosed information about Arçelik are excluded from this scope.

In the assessment of whether to make a material event disclosure within the scope of the verification obligation, the circulation or recognition of the media outlet where the news is published is taken into consideration.

In fulfillment of the verification obligation, Arçelik A.Ş. applies the following principles in principle:

- a. If the news is not of such importance that it qualifies as inside information, no disclosure is made in principle. However, the Corporate Communications Directorate separately evaluates whether it would be beneficial to make a press release about such news that does not require a material event disclosure in accordance with CMB regulations.
- b. If a material event disclosure or other public disclosure tools within the scope of CMB regulations have been previously made for news that qualify as inside information, no action is taken.
- c. In principle, no comments are made on internal information that is postponed to be disclosed or on questions from the media about issues that are not on the agenda, or on gossip, rumors and news that are clearly unfounded.
- d. A material event disclosure is made if there is a news item that can be considered as inside information, that may affect the value of Arçelik A.Ş. shares and investor decisions, that is incorrect or contains material errors or omissions.
- e. In the event that the news published in the press and media organs is about a situation whose public disclosure has been postponed;
  - In the event that the news contains material and accurate information that may affect the investor decision, it is accepted that the reasons for postponement limited to the said information have disappeared and a material event disclosure limited to this information is made immediately.
  - If the news item contains false, inaccurate or materially incomplete information, no disclosure may be made, as there will be no leakage of inside information.
- f. If deemed necessary to protect the interests of Arçelik A.Ş. and its investors, material event disclosures may also be made for unfounded news or issues that are deemed beneficial for clarification.
- g. Independent of the material event disclosure, if deemed appropriate by the Corporate Communications Directorate, a press release or press and public disclosure can be made via Arçelik's corporate social media accounts.

### **3.7. Disclosure of Forward-Looking Assessments**

Arçelik A.Ş. may disclose its forward-looking assessments to the public within the framework of the principles set forth in the capital markets legislation. The following principles shall be complied with in the disclosures to be made regarding forward-looking assessments:

- Forward-looking statements and the key assumptions underlying them may be disclosed, in principle, up to four times a year, following the public disclosure of quarterly financial statements.
- The disclosure may be made through the investor presentation published on PDP and the corporate website of the Company and/or the quarterly annual report or, if necessary, through a material event disclosure.
- The statement clearly and explicitly states that actual results may differ materially from expectations due to possible risks and uncertainties and other factors.



- In the event of a significant change in the publicly disclosed assessments, in other words, in the event that the forecasts and bases in the forward-looking information previously disclosed to the public do not materialize or it is understood that they will not materialize, a material event disclosure is made without limitation of number and the changes in expectations are shared with investors.
- In the event that there is a significant difference between the expectations previously disclosed to the public and the realizations, the reasons for these differences shall also be included in the expectations to be updated and disclosed to the public at the place where the relevant disclosure is made regarding the future assessments.
- Forward-looking assessments may include, but are not limited to, information on investments, turnover expectations, profitability ratios, Working Capital / Sales indicators.

#### **4. OTHER PUBLIC DISCLOSURE POLICIES**

##### **4.1. Exercise of Shareholder Rights**

Information and documents such as prospectuses, announcement texts, information documents on general assembly meetings, capital increases, dividend payments, merger and demerger transactions within the framework of the provisions of the Turkish Commercial Code and CMB regulations and Arçelik A.Ş. Articles of Association are announced on the Public Disclosure Platform (KAP) in due time to ensure that shareholders are informed. In addition to the places specified in the regulation, these documents are also announced on Arçelik A.Ş. website on the same day and investors' access to these documents is facilitated.

##### **4.2. Public Disclosure of Financial Statements**

The financial statements of Arçelik A.Ş. are prepared on a consolidated basis in accordance with the Turkish Financial Reporting Standards within the framework of CMB regulations and disclosed to the public on a quarterly basis within the periods determined by the CMB. The annual consolidated financial statements are subject to full independent audit and the semi-annual consolidated financial statements are subject to limited independent audit. Arçelik A.Ş. consolidated financial statements and notes to the consolidated financial statements, which are prepared in Turkish and English, are available retrospectively on Arçelik A.Ş. website.

Consolidated financial statements and footnotes are submitted to the approval of the Board of Directors with the approval of the Audit Committee within the framework of CMB regulations before being disclosed to the public. After the statement of responsibility is signed, the financial statements, footnotes and independent audit report, if any, are disclosed on the Public Disclosure Platform.

In addition to the information disclosed in the consolidated financial statements, additional information regarding Arçelik's financials may be disclosed in the investor presentations prepared for each financial statement period in order to enable investors to make the requested analysis.

##### **4.3. Public Disclosure of Annual Reports**

Arçelik A.Ş. prepares its financial statements and annual reports for the same periods and discloses them to public in due time in accordance with the procedure determined by CMB. The content of the Annual Report is prepared in accordance with international standards, Turkish Commercial Code, CMB regulations and CMB corporate governance principles. The annual report is prepared in coordination with the Corporate Communications Directorate, the Financial Planning and Corporate Performance Directorate and the Finance and Corporate Risk Directorate and is submitted to the Board of Directors for approval upon the approval of the Audit Committee.

Although it is essential that the annual report is disclosed to the public together with the financial statements of Arçelik A.Ş., it may not always be possible to disclose the annual report simultaneously with the financial statements, especially since the annual report is prepared in printed form. In this case, the annual report is disclosed to the public after the financial statements, but at least three weeks before the ordinary general shareholders' meeting and in any case within the period determined in accordance with the CMB regulations, by being published on PDP and Arçelik A.Ş.'s website together with the statement of responsibility.

Printed copies of the annual report, which is available in Turkish and English on the website, can be obtained from Arçelik A.Ş. Corporate Communications, Capital Market Legislation Compliance and Investor Relations Department.

In addition, interim activity reports prepared on a quarterly basis are disclosed to the public through PDP and made available to investors in Turkish on the corporate website.

## 5. AUTHORITY AND RESPONSIBILITY

The Board of Directors is responsible for establishing, executing, auditing, updating and disclosing the Disclosure Policy to the public in accordance with the legislation, particularly the Turkish Commercial Code, CMB and BIST regulations.

The Disclosure Policy approved by the Board of Directors is disclosed to the public in Turkish and English on the Public Disclosure Platform (KAP) and on the corporate website. In case of any change in the disclosure policy, the policy is updated by the Capital Markets Legislation Compliance Unit and submitted to the approval of Arçelik A.Ş. Board of Directors. The new text approved by the Board of Directors is disclosed to the public on PDP and on the website.

Although the responsibility of the Policy lies with the Board of Directors of Arçelik A.Ş., it is the responsibility of Arçelik A.Ş.'s Assistant General Manager of Finance and Accounting, Finance and Corporate Risk Directorate, Investor Relations and Capital Market Legislation Compliance Directorate and/or Corporate Communications Directorate, depending on the subject matter, to ensure and implement the fulfilment of the principles and procedures set forth in this Policy.

Investors and/or stakeholders may submit their questions, complaints, opinions and suggestions within the scope of this Policy of Arçelik A.Ş. to the Investor Relations Unit.

## 6. APPROVAL AND AMENDMENT STATUS

This Policy was approved by the decision of Arçelik A.Ş. Board of Directors dated 28.04.2023 and numbered 1157. Upon the entry into force of this Policy, the Policies previously disclosed to the public as given in the table below shall cease to be in force.

| Date of the Board of Directors Decision Approving the Policy | Date of Disclosure of the Policy on PDP: |
|--|--|
| 25.03.2009   | 25.03.2009                               |