

AĞAOĞLU AVRASYA GAYRİMENKUL YATIRIM ORTAKLIĞI A.Ş. (THE “COMPANY”)

DISCLOSURE POLICY

1. Purpose

The purpose of the Disclosure Policy is to provide complete, fair, accurate, and timely information to all relevant parties primarily stakeholders, investors, employees, customers, and authorized institutions in accordance with the regulations to which the Company is subject and the provisions of its Articles of Association. Such information is shared simultaneously in a timely, clear, cost-effective, and easily accessible manner, in line with the principles of active, effective, and transparent communication.

In its public disclosure activities, the Company complies with the Capital Markets Law No. 6362 (“CML”), the Turkish Commercial Code No. 6102 (“TCC”), capital markets legislation, other relevant legislation, and the regulations of Borsa İstanbul Inc. (“BIST”). The Company exercises utmost care in adhering to the principles set forth in the Corporate Governance Principles published by the Capital Markets Board (“CMB”), as may be amended from time to time.

Pursuant to Article 29 of the Company’s Articles of Association titled “Disclosure of Information,” the Company fulfills its obligation to provide information to the Capital Markets Board (CMB) in accordance with the procedures and principles set forth in the capital markets legislation. Financial statements and reports prepared in accordance with CMB regulations, as well as independent audit reports, are disclosed to the public in compliance with the relevant provisions of the Turkish Commercial Code and the capital markets legislation.

Company announcements are made through the Turkish Trade Registry Gazette and/or the Public Disclosure Platform (KAP) within the time periods stipulated under the relevant legislation. Material event disclosures and any other disclosures required by CMB regulations are also made in a timely manner in accordance with applicable legislation.

The Company’s Disclosure Policy has been prepared in accordance with the CMB’s Communiqué on Material Events (II-15.1) and Corporate Governance Communiqué (II-17.1), and is announced to shareholders and all stakeholders via the Company’s website (www.agaoglugyo.com.tr).

2. Authority and Responsibility

The Disclosure Policy has been established by the Board of Directors within the framework of the CMB Corporate Governance Principles and submitted to the approval of shareholders as a separate agenda item at the General Assembly meeting.

The monitoring, supervision, development, and updating of the Policy fall under the authority and responsibility of the Board of Directors. Any amendments to the Disclosure Policy shall be published on the Company’s website following approval by the Board of Directors.

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Tel: 0 (216) 687 1111 pbx Fax: 0 (216) 687 7126

Mersis No: 0009186281200001

Kozyatağı V.D. 0091862812

The supervision and monitoring of all matters related to public disclosure are carried out by the Investor Relations Department. All questions regarding the implementation of this Policy should be directed to the Investor Relations Department.

3. Methods and Tools of Disclosure

Within the framework of its Disclosure Policy, the Company utilizes the following methods and tools:

- Periodic financial statements, independent auditor reports, and disclosures submitted via the Public Disclosure Platform (KAP)
- Annual activity reports
- The Company's website (www.agaoglugyo.com.tr)
- Material event disclosure forms
- Announcements made through the Turkish Trade Registry Gazette and daily newspapers
- Communication methods such as telephone, e-mail, and fax

4. Information Meetings and Press Releases

Information requests from shareholders, investors, and analysts are responded to by the Investor Relations Department in writing, verbally, or through information meetings, within the scope of publicly disclosed information, in a complete and accurate manner and in compliance with the principle of equality.

Matters subject to material event disclosure, including forward-looking assessments, may be announced to the public through the press, press conferences, and other communication tools. Such matters are disclosed via KAP and may also be published on the Company's website.

Company officials may participate in national and international meetings and conferences from time to time for the purpose of sharing information with investors and analysts. Presentations and reports used in such events may be published on the Company's website.

5. News and Rumors in the Press or on Websites

The Company monitors news and rumors published in the press, on the internet, and through other communication channels via media monitoring agencies. As a general rule, no comments are made on speculative news published in the media.

The Board of Directors and the Investor Relations Department evaluate the potential impact of such news and rumors on the value of the Company's shares and investor decisions and determine whether a material event disclosure is required.

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If it is concluded that a news item may affect investors, a material event disclosure is made accordingly. Such disclosures may be made by the Members of the Board of Directors other than the Independent Board Members.

6. Ensuring the Confidentiality of Material Events

Until material events are publicly disclosed, the Company's management is responsible for maintaining the confidentiality of such information. Employees who have access to such information may not share it with third parties until it is publicly disclosed.

In order to protect its legitimate interests, provided that investors are not misled and confidentiality is ensured, the Company may postpone the disclosure of inside information. In such cases, all necessary measures are taken to ensure confidentiality.

If it is determined that the information has been disclosed to third parties and confidentiality can no longer be ensured, a material event disclosure shall be made immediately. Once the reasons for postponement cease to exist, the disclosure is made without delay, and the reasons for postponement are explained.

Employees are provided with training regarding legislation and sanctions related to inside information. Persons with access to such information acknowledge the applicable sanctions in writing.

7. Determination of Persons with Managerial Responsibilities

Within the scope of capital markets legislation, "Persons with Managerial Responsibilities" are defined as: (i) Members of the Board of Directors, and (ii) persons who, although not members of the Board of Directors, have regular access to inside information and the authority to make administrative decisions that may affect the Company's future objectives by using such information.

Within the Company, these persons consist of the Members of the Board of Directors, the CEO, and senior executives.

8. Disclosure of Forward-Looking Statements

Plans and forecasts regarding the future may be publicly disclosed in accordance with capital markets legislation if they fall within the scope of inside information or provide investors with insight into the Company's future activities, financial condition, and performance.

Such information is disclosed together with the underlying assumptions and past realizations. If it becomes apparent that forecasts will not be realized to a significant extent, the information is reviewed and revised accordingly.

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Assessments are based on reasonable assumptions and estimates. In the event that forecasts are not realized due to unforeseen developments, the reasons for such deviations are publicly disclosed.

Forward-looking statements of the Company may be made by the Members of the Board of Directors other than the Independent Board Members. In addition to material event disclosures, such statements may also be made through the media, press conferences, national and international conferences, and other communication channels.