

LİMAK DOĞU ANADOLU ÇİMENTO SANAYİ VE TİCARET ANONİM ŞİRKETİ
(the ‘Company’)
DISCLOSURE POLICY

1. Objective and Scope

Within the framework of this disclosure policy (the ‘**Disclosure Policy**’), the Company makes public disclosures in a complete and timely manner, ensuring compliance with the applicable provisions of capital market regulations, corporate governance principles (the ‘**Corporate Governance Principles**’), as set forth in the Capital Markets Board's (‘**CMB**’) Corporate Governance Communiqué No. II-17.1, as well as the provisions of the Company's articles of association.

The purpose of this Disclosure Policy is to provide equal disclosure of information regarding the Company’s past performance, future expectations, strategies, and goals (excluding information classified as trade secrets), as well as its vision, to the public, relevant regulatory institutions, current and potential investors, and stakeholders.

However, the Company may refrain from public disclosure of trade secrets and certain confidential information within the framework of principles stipulated in applicable regulations in such cases where disclosure may be detrimental to the legitimate interests of the Company.

This Disclosure Policy is applicable to all employees within the Company.

2. Authority and Responsibility

This Disclosure Policy was created by the Board of Directors within the framework of the Corporate Governance Principles. Implementation, development, and monitoring of the Disclosure Policy fall under the authority and responsibility of the Board of Directors.

Similarly, any changes to the Disclosure Policy must be approved by the Board of Directors before taking effect and will be published on the website.

Oversight and monitoring of all matters related to public disclosures fall under the responsibility of the relevant managers overseeing financial management and reporting, as well as the Investor Relations Department. The responsible managers carry out these duties in close cooperation with the Audit Committee and the Board of Directors.

3. Methods and Means of Disclosure

Subject to the applicable provisions of the capital market regulations, Borsa İstanbul regulations, and the Turkish Commercial Code No. 6102, the methods and means used by the Company for public disclosure are listed below:

- Disclosures of material events published on the Public Disclosure Platform (‘**PDP**’) and the Company’s public disclosure form
- Financial statements and activity reports published on the PDP
- Announcements and notices made through the Turkish Trade Registry Gazette and daily newspapers
- Press releases made through written and visual media
- Corporate website (<https://www.limakdoguanadolucimento.com/>)
- Information meetings held with investors and analysts either face-to-face or via teleconference, as well as information sent to investors and analysts via email.

4. Public Disclosure of Financial Statements

Financial reports and activity reports issued quarterly and at the end of the year, in accordance with CMB regulations, are submitted to the Public Disclosure Platform (PDP) as required by applicable legislation. The reports generated are also published on the corporate website.

5. Public Disclosure of Material Events and Authorized Persons

The Company makes public disclosures regarding the value of publicly traded capital market instruments and any material circumstances or developments that could influence the investment decisions of investors or their rights, in accordance with Communiqué No. II-15.1 on Material Events Disclosure.

Disclosures of material events are prepared by the Investor Relations Department, electronically signed, and submitted to the Public Disclosure Platform (PDP) for public disclosure. The Company publishes disclosures of material events on its website by the next business day following the public disclosure, and these disclosures are maintained on the website for a period of 5 years.

6. Determination of Persons Having Administrative Responsibility

Within the framework of capital market regulations, 'Persons Having Administrative Responsibility' are defined as members of the Company's Board of Directors and individuals who regularly access the Company's insider information, either directly or indirectly. These individuals possess the authority to make administrative decisions that affect the Company's future development and business goals, even if they are not necessarily members of the Board of Directors.

Persons Having Administrative Responsibility within the Company are identified as the members of the Board of Directors and the authorized signatories in Groups A, B, C, and D as listed in the Company's authorized signatures list.

7. Public Disclosure of Forward-Looking Statements

In addition to disclosures of material events, forward-looking statements can be made in accordance with capital market regulations by individuals authorized through a resolution of the Board of Directors. These statements may utilize press publications, press conferences and/or press releases, national and international conferences or meetings, or other communication channels.

Forward-looking statements are based on reasonable assumptions and estimates. If there are significant discrepancies between previously disclosed public information and actual outcomes due to unforeseen risks and developments, public disclosure will occur alongside an explanation of the reasons for such deviations. Special care is taken to ensure that any Company activities and strategies not approved by a Board of Directors' resolution are excluded from forward-looking statements made by managers authorized for public disclosure.

8. Communication with the Participants of the Capital Market

The Company does not provide guidance on expectations for interim and annual operating results. Instead, it prefers to convey to the capital market participants critical matters that affect its operating results, its strategic approaches, and key factors that facilitate a better understanding of the industry and the operating environment. Unless otherwise provided in the Disclosure Policy, only persons authorized to make public disclosures on behalf of the Company may establish communication with capital market participants.

9. Corporate Website

The Company's website (<https://www.limakdoguanadolucimento.com/>) is actively utilized for public disclosures, as recommended by the Corporate Governance Principles. The disclosures available on the Company's website do not substitute the notifications and material event disclosures that are required to be made in accordance with the applicable provisions of capital market regulations. Access to all public disclosures made by the Company is provided through the website. The website is configured and compartmentalized accordingly. All kinds of necessary measures for the security of the website are taken. The website is organized by content and form as stipulated by the Corporate Governance Principles. In particular, the announcement regarding the general meetings, the information documents related to the agenda items, other information, documents, and reports concerning the agenda items, and details about participation methods for the general assembly will be prominently featured on the website. Ongoing efforts are made to continuously develop and enhance the website.

10. Silent Period

The Company does not make any statements regarding operating results during the period from the end of each quarterly reporting period until the time when the activity reports are publicly disclosed. During this silent period, financial results are not discussed except for information already publicly disclosed. During this silent period, it is prohibited for persons having insider information or ongoing information, as well as their spouses, children, or anyone living in the same household, to trade in the Company's capital market instruments.

However, this does not prevent persons who are authorized to make public disclosures about the Company from issuing press releases or participating as speakers in events such as conferences or panels, provided they comply with the confidentiality of insider information during the relevant silent periods.