



# IC ENTERRA

Renewable Energy

## DISCLOSURE POLICY

### 1. Purpose

The purpose of the Disclosure Policy is to ensure transparent communication that is clear, accurate, true, understandable, low-cost, easily accessible, simultaneous, active, and effective. This is to be achieved by sharing all non-commercial information—without violating trade secrets—with shareholders, investors, employees, customers, authorized institutions, and all other stakeholders, in compliance with the applicable regulations and the provisions of the Company’s Articles of Association..

The Company complies with the Capital Markets Law No. 6362 (“CML”), the Turkish Commercial Code No. 6102 (“TCC”), capital markets legislation, and other relevant laws and regulations, as well as the regulations of Borsa Istanbul A.Ş. (“BIST”) on public disclosures. The Company also pays maximum attention to the implementation of the Corporate Governance Principles set forth in the Corporate Governance Communiqué, as periodically amended and updated by the Capital Markets Board (“CMB”).

According to Article 12 of the Company’s Articles of Association titled “Disclosure, Public Announcements, and Notices”:

*“The Company fulfills its disclosure obligations to the CMB in accordance with the procedures and principles set out in the capital markets legislation. Financial statements and reports required to be prepared by the CMB, as well as independent audit reports, are disclosed to the public within the framework of the procedures and principles stipulated in the TCC and the capital markets legislation.”*

*“Announcements of the Company are made in accordance with the TCC, capital markets legislation, and other relevant legal provisions within the periods specified therein and on time. Special circumstance disclosures and all other disclosures to be made in accordance with the CMB regulations shall be announced to the public within the periods and in the manner set forth in the relevant legislation.”*

The Company’s Disclosure Policy has been prepared in accordance with Article 17 of the CMB’s Material Events Communiqué (II-15.1) and Article 17.1 of the Corporate Governance Communiqué (II-17.1), and is disclosed to all stakeholders via the Company’s website.

[bilgi@icenterra.com.tr](mailto:bilgi@icenterra.com.tr)

Tel: (0312) 285 83 63

Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20 Çankaya / Ankara



# IC ENTERRA

Renewable Energy

## 2. Authority and Responsibility

The Disclosure Policy has been established by the Board of Directors within the framework of the Capital Markets Board (CMB) Corporate Governance Principles and has been presented to the shareholders as a separate agenda item at the Company's General Assembly meeting. The monitoring, oversight, development, and necessary updates of the Company's public disclosure and information 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 the approval of the Board of Directors. The Investor Relations Department has been assigned to oversee and monitor all matters related to public disclosure. All questions regarding the implementation principles and procedures of this policy should be directed to the Investor Relations Department.

## 3. Methods and Tools of Disclosure

Within the framework of the Disclosure Policy, the methods and tools used by the Company for information disclosure are listed below:

- Periodically submitted financial statements, independent audit reports, and declarations disclosed via the Public Disclosure Platform (KAP)
- Annual Activity Reports
- Company Website
- Material Event Disclosure Forms
- Announcements and notices published in the Turkish Trade Registry Gazette and daily newspapers
- Communication methods such as telephone, e-mail, and fax

## 4. Principles Regarding Presentations and Reports Disclosed at Briefings or Press Conferences

Information requests from shareholders, investors, and analysts are responded to by the Investor Relations Department in written or verbal form, or via information meetings, in accordance with the principle of equality and within the scope of information already disclosed to the public.

In the disclosure of matters subject to material events, including forward-looking assessments, press and media channels may be used, press conferences may be held, press releases may be published, and other communication methods may be utilized. An announcement is also made on the Public Disclosure Platform (KAP) prior to or simultaneously with such public disclosures, and the related announcement is also published on the Company's website.

Company representatives may occasionally attend national or international conferences or meetings to share information with investors and analysts. Presentations and reports used during these events may be published on the Company's website.

[bilgi@icenterra.com.tr](mailto:bilgi@icenterra.com.tr)

Tel: (0312) 285 83 63

Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20 Çankaya / Ankara



# IC ENTERRA

Renewable Energy

## **5. Principles for Monitoring News and Rumors About the Company in the Media or on Websites and Making Related Disclosures**

The Company monitors news and rumors appearing in national or international media outlets, websites, and other communication channels through a media monitoring agency.

As a general principle, the Company does not comment on speculations appearing in the media, on websites, or via other communication channels. The assessment of whether any news or rumor may have an impact on the value of the Company's shares or on investors' decisions is made by the Chairman of the Board, the Vice Chairman of the Board, and the Investor Relations Department. They also decide whether a material event disclosure should be made. If it is concluded that the news or rumors may affect the value of the Company's shares or influence investors' decisions, a material event disclosure is made regarding the matter. The authority to make such material disclosures on behalf of the Company belongs to the Chairman and Vice Chairman of the Board.

## **6. Measures Taken to Ensure Confidentiality Until the Disclosure of Material Events to the Public**

Until material events are disclosed to the public, the Company's management is responsible for ensuring the confidentiality of such information. Within this scope, employees who have access to the relevant information are prohibited from sharing it with third parties until the material disclosure is made. The Company may postpone the public disclosure of insider information to avoid harm to its legitimate interests, provided that such postponement does not mislead investors and that the confidentiality of the information can be preserved. In such cases, the Company takes all necessary measures under capital markets legislation to ensure the confidentiality of insider information. If it is determined that insider information has been disclosed to third parties and it is concluded that confidentiality can no longer be maintained, a material event disclosure shall be made immediately in accordance with capital markets regulations. As soon as the reasons for the postponement of public disclosure of insider information are eliminated, the information is disclosed to the public in accordance with the applicable legislation. The disclosure includes the postponement decision and the underlying reasons. The Company informs its managers and employees through in-house training about their obligations under the law and relevant regulations regarding insider information, as well as the sanctions related to the misuse or dissemination of such information. For employees and third parties who are not listed among those with access to insider information, the Company takes necessary precautions—such as obtaining confidentiality agreements—to prevent unauthorized access. Individuals who are listed as having access to insider information are formally informed in writing, with acknowledgment by signature, regarding their legal obligations and the sanctions concerning the misuse or dissemination of such information.

[bilgi@icenterra.com.tr](mailto:bilgi@icenterra.com.tr)

Tel: (0312) 285 83 63

Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20 Çankaya / Ankara



# IC ENTERRA

Renewable Energy

## 7. Principles Used to Identify Persons with Administrative Responsibility

Within the framework of capital markets legislation, “Persons with Administrative Responsibility” are defined as:

- (i) members of the Company’s Board of Directors, and
- (ii) individuals who, although not members of the Board of Directors, have regular direct or indirect access to the Company’s insider information and have the authority to make administrative decisions that affect the Company’s future development and commercial objectives.

At our Company, Persons with Administrative Responsibility are identified as Members of the Board of Directors, Directors, and Department Group Leaders.

## 8. Principles Regarding the Disclosure of Forward-Looking Statements

Forward-looking assessments that contain internal information about future plans and projections, or that provide investors with insights into the Company’s future operations, financial position, and performance, may be disclosed to the public within the framework of the principles set forth in capital markets legislation.

If forward-looking information is disclosed to the public, it must be presented along with the assumptions on which it is based and the historical realizations supporting those assumptions. If it is later understood that such projections will not be realized to a significant extent, the information is reviewed and revised accordingly.

Forward-looking assessments are based on reasonable assumptions and estimates. In the event of deviations due to unforeseen risks or developments, and if there is a significant difference between previously disclosed information and actual outcomes, a public disclosure is made including the reasons for such differences.

The Chairman and the Vice Chairman of the Board of Directors are authorized to make disclosures regarding forward-looking assessments on behalf of the Company.

Such forward-looking assessments may be disclosed through material event disclosures as well as through press and media channels, press conferences, press releases, national and international conferences or meetings, and other communication methods, in accordance with capital markets legislation.

[bilgi@icenterra.com.tr](mailto:bilgi@icenterra.com.tr)

Tel: (0312) 285 83 63

Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20 Çankaya / Ankara



# ICENTERRA

Renewable Energy

## 9. Company Website [[www.icenterra.com.tr](http://www.icenterra.com.tr)]

In line with the recommendations of the CMB Corporate Governance Principles, the Company's website ([www.icenterra.com.tr](http://www.icenterra.com.tr)) is actively used for public disclosure purposes. The statements published on the Company's website do not replace the disclosures and material event statements required to be made under capital markets legislation. Access to all public disclosures made by the Company is provided through the website. The website is structured and segmented accordingly.

All necessary measures are taken to ensure the security of the website. The content and format of the website are arranged in accordance with the requirements of the CMB Corporate Governance Principles. In particular, announcements regarding general assembly meetings, informative documents on the agenda items, other relevant information, documents, and reports related to the agenda items, as well as details on the methods of participation in the general assembly, are made prominently available on the website.

The website is continuously improved and updated.

[bilgi@icenterra.com.tr](mailto:bilgi@icenterra.com.tr)

Tel: (0312) 285 83 63

Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No: 20 Çankaya / Ankara