

## Information Policy

### 1. Purpose

The management of Akçansa Çimento Sanayi ve Ticaret A.Ş. is proud of being in transparent and close communication with its shareholders. The main goal is to increase the value of Akçansa Çimento Sanayi ve Ticaret A.Ş. for the shareholders and also, to turn its shares into attractive investment instruments for the potential investors as well.

The management of Akçansa Çimento Sanayi ve Ticaret A.Ş. adopts implementing the strategic plans for this purpose and sharing its results fully, justly, correctly, in time and understandably with the public, shareholders, investors and capital market specialists (joint capital market participants) pursuant to financial reporting standards and provisions of Capital Market Legislation equally as a principle.

Akçansa Çimento Sanayi ve Ticaret A.Ş. complies with Capital Market Legislation, Turkish Trade Code legislation and Borsa İstanbul A.S. (BIST) regulations about the public disclosure, and pays maximum attention for accomplishing the principles on CMB Corporate Governance Principles.

Information Policy includes all employees and consultants of Akçansa Çimento Sanayi ve Ticaret A.Ş. and regulates written and verbal communication of Akçansa Çimento Sanayi ve Ticaret A.Ş. with participants of the capital market.

Information Policy of Akçansa Çimento Sanayi ve Ticaret A.Ş. has been prepared in accordance with Article 17 of "Material Disclosure Communiqué" with Serial No. II 15.1 of Capital Market Board and is announced to all stakeholders through the web site of Akçansa Çimento Sanayi ve Ticaret A.Ş.

### 2. Authority and Responsibility

Information Policy has been constituted and approved by the Board of Directors pursuant to CMB Corporate Governance Principles. Surveillance, supervision and development of public disclosure and information policy of Akçansa Çimento Sanayi ve Ticaret A.Ş. is under authority and responsibility of the Board of Directors. Financial Affairs Directorate under the body of Deputy General Manager-Finance has been appointed in order to supervise and to pursue all kinds of issues concerning the public disclosure.

### 3. Public Disclosure Methods and Instruments

It is informed through information instruments such as material disclosures, financial statements and reports, annual activity reports, web page, presentations, investor meetings and teleconferences, information letters, press releases, Trade Registry Paper. Basic public disclosure methods and instruments used by Akçansa Çimento Sanayi ve Ticaret A.Ş. have been stated in the following provided that provisions of Capital Market Legislation and Turkish Commercial Code (TCC) are reserved;

- Material disclosures transmitted through Public Disclosure Platform (PDP),
- Financial statement and footnotes, independent audit report, declarations and activity report transmitted periodically to Public Disclosure Platform (PDP),
- Announcements and proclamations performed through Turkish Trade Registry Paper (letter of authorized signatures, general board call etc.)
- Press releases performed through written and visual media,
- Disclosures made to data distribution institutions such as Reuters, Forex etc.,
- Information discussions and meetings held with capital market participants face to face or through teleconference,
- Notifications of Corporate Web Site ([www.akcansa.com.tr](http://www.akcansa.com.tr)),
- Disclosures made through communication methods and instruments such as telephone, mobile phone (wap and similar technologies), electronic mail, telefax etc.

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

Financial statements and footnotes of Akçansa Çimento Sanayi ve Ticaret A.Ş. are prepared on consolidated basis and in accordance with Turkish Accounting Standards /Turkish Financial Reporting Standards (TAS/TFRS). Annual and semi-annual financial statements are disclosed to the public after an independent audit.

Financial statements and footnotes are approved by the Board of Directors through assent of Audit Committee pursuant to provisions of Capital Market Legislation before any public disclosure. After accuracy statement is signed, financial statement and footnotes, independent audit report and attached documents are transmitted to PDP and then, disclosed to the public in accordance with CMB and BIST regulations following the approval of Board of Directors, and then, published on the Company's web site. Financial statements and footnotes of previous period can be accessed through the Company's web site.

#### **5. Public Disclosure of Activity Report**

Activity report is prepared in accordance with Capital Market Legislation and CMB Corporate Governance Principles. It is approved by the Board of Directors and then, disclosed to the public together with the financial statements. It is published in the Company's web site ([www.akcansa.com.tr](http://www.akcansa.com.tr)).

Furthermore, a summarized activity report is prepared quarterly and it is published together with financial statements in PDP and Company's Web Site. The activity report prepared annually is also published as printed in order to be submitted to competent authorities as well.

#### **6. Public Disclosure of Special Cases and Authorized Persons**

Material disclosures of Akçansa Çimento Sanayi ve Ticaret A.Ş. are prepared by Financial Affairs Directorate under the body of Deputy General Manager-Finance and signed electronically, transmitted to PDP and then, disclosed to the public.

Material disclosures are issued correctly, understandably, sufficiently and free from misleading statements in order to assist decisions of persons and institutions who/which shall benefit from the disclosure.

If any staff of Akçansa Çimento Sanayi ve Ticaret A.Ş. determines that any important and private information, which has not been disclosed to the public in advance, is disclosed to the public, it informs the status to Financial Affairs Directorate under the body of Deputy General Manager-Finance immediately. In this case, appropriate material disclosure is prepared and then, submitted to PDP in accordance with provisions of Capital Market Legislation by Financial Affairs Directorate.

Akçansa Çimento Sanayi ve Ticaret A.Ş. announces material disclosures of Akçansa Çimento Sanayi ve Ticaret A.Ş. in Turkish language at its web site ([www.akcansa.com.tr](http://www.akcansa.com.tr)) at the latest within the business day following the public disclosure and makes such disclosures available in its web site for five years period.

#### **7. People Who Are Authorized to Make Public Disclosure**

Written and verbal information requests transmitted by Capital Market Participants or any institution/person other than above mentioned notifications are assessed by Deputy General Manager-Finance or Financial Affairs Director. Upon the assessment, it is considered whether the request is in the nature of trade secret or not according to its content and whether it is in the type of affecting investment decisions and the value of capital market instruments pursuant to "Material Disclosure Communiqué" with Serial No. II - 15.1 of Capital Market Board. Written and verbal information requests are answered by the related unit after the assessment of Deputy General Manager-Finance or Financial Affairs Directorate.

Press releases made to written and visual media and data distribution channels such as Reuters, Forex etc. can be made only by Chairman of Board of Directors, General Manager or Deputy General Manager-Finance.

Apart from this, unless employees of Akçansa Çimento Sanayi ve Ticaret A.Ş. are appointed especially, they can not answer incoming questions of capital market participants. Incoming information requests are directed to Deputy General Manager-Finance, Financial Affairs Directorate.

## **8. List of People Having Administrative Responsibility and Accessing Internal Information**

People having administrative responsibility are the people who access regularly internal information of Akçansa Çimento Sanayi ve Ticaret A.Ş. directly or indirectly and are authorized to make administrative decisions affecting future development and commercial targets of Akçansa Çimento Sanayi ve Ticaret A.Ş. Therefore, people who are not authorized to make administrative decision are not assessed under the scope of person who has administrative responsibility and accesses internal information continuously.

If Members of Board of Directors are the people who access information regularly and also, make administrative decisions, they are composed of General Manager and Deputy General Managers.

When the list of people who access the internal information is requested in accordance with Article 7 of "Material Disclosure Communiqué" with Serial No. II - 15.1 of Capital Market Board, it is maintained in writing at Financial Affairs Directorate for submission to CMB and/or BIST. Everybody in the list is notified about protecting internal information and complying with confidentiality rules during their duty terms. This list is available at Akçansa Çimento Sanayi ve Ticaret A.Ş. and has been notified to Central Registry Agency. The notification is renewed when such people are changed.

## **9. Communication with Capital Market Participants**

Akçansa Çimento Sanayi ve Ticaret A.Ş. does not make any guidance about expectations concerning interim period and annual activity results. Alternatively, Akçansa Çimento Sanayi ve Ticaret A.Ş. prefers to transmit critical issues affecting activity results, strategic approaches, and important issues ensuring better understanding of the sector and operated environment to the capital market participants. Unless otherwise stated in the information policy, only people, who are authorized to make public disclosure on behalf of Akçansa Çimento Sanayi ve Ticaret A.Ş., may establish the communication with capital market participants.

## **10. Incorrect News Circulating on the Market**

In principle, Akçansa Çimento Sanayi ve Ticaret A.Ş. does not inform any opinion about market rumors and speculations. Corporate Communication Management follows news and rumors about Akçansa Çimento Sanayi ve Ticaret A.Ş. in the media organs and web sites, and informs to Deputy General Manager - Finance. Deputy General Manager - Finance, Financial Affairs Directorate assesses whether such news and information shall have any influence on the capital instruments or not.

Deputy General Manager - Finance decides whether Financial Affairs Directorate makes any material disclosure pursuant to Article 9 of "Material Disclosure Communiqué" with Serial No. II-15.1 of Capital Market Board.

On the other hand, when verification request comes from CMB and/or BIST within provisions of Capital Market Legislation or in the event that the management decides that it is required and more suitable to give any answer, the disclosure is made about rumors and gossips circulating on the market.

## **11. Postponing Public Disclosure of Internal Information**

People, who are listed for accessing internal information of Akçansa Çimento Sanayi ve Ticaret A.Ş., are informed about obligations of keeping confidential the internal information which they may have

during execution of their duties or conduct of works and transactions on behalf of the Company and have not been disclosed to the public yet, not using them by providing any interest for themselves and third parties or not disclosing them to third parties without any authority.

Akçansa Çimento Sanayi ve Ticaret A.Ş. may postpone public disclosure of internal information pursuant to Article 6 of "Material Disclosure Communiqué" with Serial No. II-15.1 of Capital Market Board in order that its legal interests are not damaged, and it is not caused to mislead the investors, in this case, it informs the persons concerning the postponement and takes measures ensuring confidentiality. Postponement procedure is realized pursuant to written approval of Board of Directors or General Manager who has been authorized generally by Board of Directors.

As long as postponement reasons of public disclosure of internal information are removed, public disclosure is made in accordance with the legislation. Postponement decision is stated on the disclosure to be made.

## **12. Meetings and Discussions Held with Investors and Analysts**

Deputy General Manager- Finance is responsible for conducting relationships with both its existing shareholders and also, potential shareholders at Akçansa Çimento Sanayi ve Ticaret A.Ş. regularly, answering investor problems in the most efficient manner and increasing the corporate value. Deputy General Manager - Finance under the body of General Directorate of Akçansa Çimento Sanayi ve Ticaret A.Ş. uses various instruments such as disclosure/announcement etc. for roadshow, teleconference, e-mail, fax, analyst presentations, direct information about increasing recognition and preferability of Akçansa Çimento Sanayi ve Ticaret A.Ş. in the international investment field, featuring its advantageous aspects when it is compared with equivalent institutions and making Akçansa Çimento Sanayi ve Ticaret A.Ş. more preferable than other companies for the institutions making investment on developing markets. Positive answer is given for all meeting requests from shareholders and it is ensured to organize discussion in the maximum level as far as possible.

Akçansa Çimento Sanayi ve Ticaret A.Ş. accepts analyst reports as property of the company which prepares the analyst report and does not publish them in the Company's Web Site ([www.akcansa.com.tr](http://www.akcansa.com.tr)). Akçansa Çimento Sanayi ve Ticaret A.Ş. does not review, verify, approve analyst reports or income models and does not take their responsibilities and does not spread them. On the other hand, in some definite and limited cases and upon request, analyst reports may be reviewed provided that only public and previous historical information is used and it is limited to a specific issue in order to prevent incorrect information of the public.

## **13. Public Disclosure of Future Assessments**

Akçansa Çimento Sanayi ve Ticaret A.Ş. may disclose its future expectations publicly from time to time in accordance with the information policy. Future assessments may be disclosed subject to decision of board of directors or written approval of person who is authorized by the board of directors. Disclosure may be made maximum four times a year. It may be disclosed at PDP in the material disclosure format or presentation format. If there is any important change, number limit may be exceeded. It is submitted for information of related parties that future assessments disclosed publicly are made according to some presumptions and may vary from realized results. In the event that there are changes related to future assessments or it is understood that assessments shall not be realized, the public opinion is informed with the same instruments without spending time.

## **14. Silent Period**

Akçansa Çimento Sanayi ve Ticaret A.Ş. refrains from arguing about financial results and other related issues in definite periods of the calendar year with capital market participants in order to prevent asymmetric information distribution and unauthorized disclosures concerning activity results. This period is called as "silent period". The silent period for Akçansa Çimento Sanayi ve Ticaret A.Ş. starts from the day following quarter intervals, end of semi-annual and annual account period and ends after a business day when financial statement and footnotes are disclosed publicly. During the silent period, Akçansa Çimento Sanayi ve Ticaret A.Ş.;

- shall not discuss financial status of Akçansa Çimento Sanayi ve Ticaret A.Ş. other than publicly disclosed information
- on the meetings to be held one by one or in groups with capital market participants,
- shall not inform any opinion about its activities and financial status unless it deems necessary and provided that provisions of Capital Market Legislation are reserved,
- shall not answer questions directed one by one and by small groups other than information disclosed publicly in connection with financial results; and shall not make any statement to such types of groups. In case such situation occurs, the statements shall be available on its Web Site ([www.akcansa.com.tr](http://www.akcansa.com.tr)).

Furthermore, people who have internal information or continuous information or spouses, children of such people or persons who live in the same home are forbidden to make transaction in the capital market instruments of the Company within the silent period.

## **15. Market Failure Actions**

Board of Directors of Akçansa Çimento Sanayi ve Ticaret A.Ş. takes and applies required measures for people in the list of internal information not to use confidential information and/or information which is in the nature of trade secret and are not disclosed to the public about the Company under the scope of Market Failure Actions so as to provide interest for themselves or others, not to provide incorrect, misleading information about the Company, not to publish news in this manner pursuant to related provisions of Capital Market Board's Communiqué with Serial No. VI 104.1.

## **16. Web Site of Akçansa Çimento Sanayi ve Ticaret A.Ş. ([www.akcansa.com.tr](http://www.akcansa.com.tr))**

Web site of Akçansa Çimento Sanayi ve Ticaret A.Ş. at [www.akcansa.com.tr](http://www.akcansa.com.tr) is used actively for public disclosure as recommended by CMB Corporate Governance Principles. Disclosures in the web site of Akçansa Çimento Sanayi ve Ticaret A.Ş. does not replace notifications and material disclosures which should be made in accordance with provisions of Capital Market Legislation. It is ensured to access all public disclosures made by Akçansa Çimento Sanayi ve Ticaret A.Ş. via web site. Web Site is configured and partitioned accordingly. All kinds of measures concerning security of the web site are taken. Web Site is arranged within the content and in the manner stipulated by CMB Corporate Governance Principles. Material Disclosures, Financial Reports, Activity Report and some information are stated in English. Especially announcement concerning general board meetings to be held, agenda articles, related information document, other information, documents and reports related to agenda articles and information about methods of participating into the general board are stated remarkably in Web Site. It is continued to the works concerning development of Web Site continuously.

Important headings, which may be followed in the web site, are summarized in the following.

- Detailed information concerning corporate identity
- Vision and main strategies
- Information about Members of Board of Directors and top management
- Company's organization and partnership structure
- CMB Material Disclosures
- Company's articles of association
- Trade registry details
- Financial details
- Press releases
- Meeting date of General Board, agenda, statements about agenda articles
- General Board meeting minutes and list of participants
- Specimen of power of attorney
- Corporate Governance practices and compliance report
- Profit distribution policy, short history and capital increases
- Information policy
- Wage Policy
- Section of Frequently Asked Questions