

PUBLIC DISCLOSURE PROCEDURE

1. BASE

This Procedure is regulated on the basis of Article 15 of the Capital Markets Law No. 6362 (the "Law") and Article 24 of Special Status Directive II-15.1 ("Directive") of the Capital Markets Board ("CMB/Board"). The issues contained in the CMB's Special Status Guide ("Guide") are considered as rulings of the Board.

2. PURPOSE

The purpose of this document is to effectively implement public disclosure practices within the scope of CMB Directive in the management of internal information revealed in Anel Elektrik Proje Taahüt ve Ticaret A.Ş. ("Anel" or "Company").

3. AIMS

Anel's public disclosure goals include:

- Determining which information will be made public by the company, in what ways and how often except as determined by the legislation within the framework of the Corporate Governance Principles issued by the Capital Markets Board and the notices to be made to the Central Registry Agency [A.Ş.],
- Determining how to respond to the questions posed to the Company and how the Company management shall inform the shareholders and the board of directors,
- Determining how and by whom the changes to disclosure procedure shall be made,
- Determining how and by whom the control of reliability of publicly disclosed information shall be performed and so on.

4. SCOPE

The scope of document is the process of the formation of internal information that has not yet been made public in Anel Elektrik Proje Taahüt ve Ticaret A.Ş., the process of publicization, postponement of public announcement, determination and implementation of measures in order to protect its privacy and how to keep this information confidential. This procedure is an integral part of the Disclosure Policy, Internal Regulations and legal regulations of Anel Elektrik Proje Taahüt ve Ticaret A.Ş.

5. GENERAL PRINCIPLES

The Company will carry out public disclosure within the framework of the general principles set out below.

- Transparency Principle; It states that real, adequate, open and comparable information about key issues such as the financial situation, performance, ownership and management structures of the Partnership should be made public at the time it should be.
- Principle of Trade Secret and Ethical Rules; The security and protection of the

company's trade secrets is essential. However, in the exercise of the right of the beneficiary to receive information, the company is obliged to comply with the rules of accuracy, honesty and goodwill.

- High Quality Principle; high quality accounting of the information to be made public (within the framework of the relevant directives of the International Accounting Standards and Capital Markets Board) means that it is prepared, audited and made public in accordance with the standards of disclosure and supervision of the financial and non-financial public bodies.
- Principle of Necessity; Shareholders' individual request for information must be necessary in order to evaluate the general situation, especially the economic situation of the partnership in par with reality or must be necessary in order to make decisions about the agenda items or items being discussed on the basis of the work, i.e. to consciously exercise the rights of the shareholders.
- Principle of Justness; The Company ensures that all shareholders and beneficiaries are informed in such a way that the rights recognized by law and by the Master Contract are adequately and necessarily protected.
- Burden of Loyalty and Prohibition of Competition; Shareholders can examine the company's documents with the open permission of the general assembly and the decision of the board of directors. They are not authorized to know internal secrets of any partner company except secrets that can be known from the financial books and documents examined as a result of this audit. Partners are obliged to keep internal secrets of the company secret at any time, even if they subsequently lose the right to a partnership.

6. POWER AND RESPONSIBILITY

Our Company's Public Disclosure Procedure is created and implemented under the authority of the Board of Directors. Occasionally, the Board of Directors reserve the right to make amendments to this Procedure in accordance with the relevant regulations. This Procedure and the amendments to be made are implemented following the approval of the Board of Directors. Monitoring, oversight and development of the Company's public disclosure policy is under the authority and responsibility of the Board of Directors. Investor Relations Unit, one of the departments affiliated with the Director of Financial Affairs and Finance, has been assigned to monitor and oversee all matters related to public disclosure.

7. TASKS

Board of Directors and the managers they appointed are obliged to post/update the following information on the company's website at www.anelgroup.com in quarterly financial reporting periods.

- Detailed information about corporate identity
- Information about Board Members and senior management
- Partnership structure as of the latest situation

- Special Status Disclosures
- Company master contract
- Date and number of Turkish Trade Registry Gazettes (Related to the Master Contract Changes)
- Capital Markets Board Registration Certificate, Price Determination Report, Letter of Description, IPO Circular
- Trade registration information
- Information about concession shares
- Financial reports, Activity Reports
- Information in the press
- Agendas of General Assembly Meetings, power of attorney example, present list, Minutes of The Meeting
- Disclosure Policy, Profit Distribution Policy, Wages Policy, Committees and Working Principles and Compliance Report on Corporate Governance Principles
- Frequently asked questions section

Periodic financial statements and footnotes to be made public on the Company's website should be prepared within the framework of existing legislation and international accounting standards, and the accounting policies implemented should be contained in the financial statement footnotes. Periodical Financial Statements and footnotes should be corrected within the framework of existing legislation and international accounting standards in accordance with the issues contained in the independent audit report.

The Annual Report to be made public by the Company should be prepared in accordance with the Principles of Corporate Governance of the Capital Markets Board and the relevant legislation. The Company must take measures to prevent material theft or disposal of a loss by using "not yet publicly available" information that may affect the value of capital market tools to benefit itself or third parties in a way that disrupts the equality of opportunity between those trading in the capital markets, i.e. the trade of inside knowledge.

The Board of Directors and senior executives can give press conferences, articles, etc. to the press regarding public disclosure and hold meetings to enlighten the public and their beneficiaries.

8. ANSWERING QUESTIONS TO BE DIRECTED TO THE COMPANY

The Company describes the contact information to be applied for answering the questions posed by shareholders and beneficiaries on its website. The company also explains frequently asked questions and answers on its website.

9. DEFINITONS

Internal Information: It expresses information, events and developments related to a concrete event that a rational investor may accept as important when making an

investment decision, which may give an advantage to the person who uses the information compared to other investors who do not know about this information, which, if made public, may have an impact on the company's share value, price or investor's investment decisions.

Continuous Information: All information, events and developments that are required to be disclosed outside the definition of internal information and specified in Directive II-15.1.

Obligation to Disclose Internal Information: It is an obligation to make public statements in the event of conditions that may affect the value, price or investment decisions of investors of capital market vehicles.

10. IMPLEMENTATION PRINCIPLES

When changes in internal information and previously disclosed issues of this information are revealed or learned by the Company, it is imperative that an special status disclosure is made in accordance with the Board's public disclosure arrangements.

In case of availability of information that may allow market participants to access different interpretations and assessments such as preliminary investigations, preliminary examinations, preliminary interviews and/or a non-binding letter of intent has been signed, although its qualifications are not yet clear, necessary measures are nevertheless taken by the Company to establish confidentiality agreements, such as by creating a list of those with access to internal information, information about legislation, postponing disclosure within the process of establishing internal information, and so on, in order to ensure that this information is confidential because it may be misleading to make public.

Whether or not the internal information is concrete is evaluated individually at the each stage of process of the formation of the information.

11. POSTPONEMENT OF PUBLIC DISCLOSURE OF INTERNAL INFORMATION

In order to protect the legitimate interests of ANEL, they may postpone the public disclosure of internal information within the framework of the relevant articles of the Capital Markets Board's Serial II-15.1 "Special Status Directive" so as not to mislead investors, in this case informing the persons relevant to the postponement and taking privacy-providing measures. The postponement is carried out in accordance with a decision by the Board of Directors. Despite taking all necessary measures to ensure the confidentiality of the information, in case of media coverage, an explanation can be made for such news in order to protect the interests of ANEL and investors in accordance with the provisions of the directive.

12. PRIVACY OF INTERNAL INFORMATION

Data about persons with access to internal information are electronically stored, listed

and updated by the Company through the Central Registries (MKK) system in accordance with the relevant legislation.

It is forbidden to share internal information by persons with access to internal information to persons inside or outside the Company, except for persons under the obligation to keep such information confidential in accordance with a legal arrangement, principal contract or special agreement, during the performance of duties related to the Company or the conduct of business and transactions on behalf of the Company. If disclosed, information contained in the disclosure will be made public by means of a special status disclosure as soon as it is learned by the Company. Persons on the Contacts List with Access to Internal Information are provided to comply with privacy rules during their duties by being notified in writing or electronically about the protection of internal information and the consequences of possible regulatory violations. Employees of the Company may not provide any internal information they have learned during their work at the Company unless authorized by the Company. All disclosures are fully, simultaneously and understandably announced in accordance with the Company's Disclosure Policy through the persons and/or units authorized by the Company and the principle of equality to investors, partners and the public within the framework of this Procedure. information contained in the disclosure.

13. DISCLOSURE OF CONTINUOUS AND GENERAL INFORMATION

The obligation of disclosure of continuous information is fulfilled by the operators within the period and principles stipulated in the Directive, by being announced on the Public Disclosure Platform (KAP).

14. PROCEDURE FOR PUBLIC DISCLOSURE

- Public disclosure activities are carried out within the framework of the "Disclosure Policy on Public Disclosure".
- Shareholders and all beneficiaries must report all questions to the Company in writing.
- The Company answers the questions of its beneficiaries in writing within the framework of existing legislation, company policy, principles and rulings of this procedure.
- Shareholders and beneficiaries may review the company's documents by the decision of the board of directors. It is not authorized to know the internal secrets of any partner company except the secrets to be known from the financial books and documents examined as a result of this audit. Partners and beneficiaries are obliged to keep the internal secrets of the company secret at all times, even if they subsequently lose the right to a partnership or being a beneficiary.

15. PEOPLE WHO ARE IN POSITION TO LEARN INSIDE KNOWLEDGE

Necessary measures have been taken to prevent the use of inside information in our company and people who have access to information that may affect the value of our company's capital market instruments are included in the "People with Access to Internal Information List". This list was prepared by ANEL and reported to the Central Registry Organization.

16. POLICY AND PROCEDURE CHANGES

This Public Disclosure Procedure can only be changed by the Decision of the Board of Directors.

17. EFFECTIVE DATE

This Procedure takes effect following the approval of the Board of Directors.

