

## **TAT GIDA SANAYİ A.Ş.**

### **DISCLOSURE POLICY**

#### **Purpose**

The Purpose of the Disclosure Policy of our Company is to inform the shareholders and investors about the activities of the company in accordance with the provisions of the Capital Market Legislation and other laws and to disclose important information promptly in a full, accurate, open, transparent and complete manner.

#### **People in Charge**

The Board of Directors is responsible to create, supervise and update the Disclosure Policy. Disclosure Policy approved by the Board of Directors is submitted to the shareholders during General Assembly and is also disclosed to public on the website.

#### **Spokespersons**

The spokespersons of the company: Members of the Board of Directors, Company's General Manager, Assistant General Managers, Accounting Manager, Finance Manager and Capital Market Board and Sales Accounting Manager. No director or company employee other than the authorized spokespersons shall be authorized to answer the questions or provide information about the financial and operational activities of the company without the consent of the senior management of the company.

No employee other than the authorized spokespersons may answer the inquiries received from the investor circles or media unless especially demanded by an authorized spokesperson. Any demands within this framework shall be referred to the authorized company spokespersons.

#### **Method and Tools**

Our company uses the following methods and tools while determining the public disclosure and disclosure policy within the framework of the provisions of Capital Market Legislation, Istanbul Stock Exchange (ISE) and Turkish Code of Commerce;

- 1- Disclosure of Material Events delivered to ISE
- 2- Financial statements and footnotes thereto sent to ISE periodically
- 3- Annual reports
- 4- Website
- 5- Press releases made through published and visual media
- 6- Announcements and notices issued through the Trade Registry Gazette and daily newspapers
- 7- Information and complimentary documents issued for the investors
- 8- Contacts with the investors and analysts conducted face to face or through means of telecommunication

#### **Disclosure of Material Events**

Disclosures on material events of our company are issued by the Department of Finance and Accounting and signed by the General Manager, Assistant General Manager-Finance and Accounting in principle and sent to the ISE. In case the relevant people are absent, the Accounting Manager and Finance Manager shall be authorized. The Disclosures on Material Events are delivered in electronic media as KAP (Kamuoyunu Aydınlatma Platformu - Public Disclosure Platform) notice. Disclosures of material events are announced on company website following publication in KAP.

#### **Criteria used in Determining the People with Administrative Responsibility**

The people to be included in the list of the people with administrative responsibility in our company consists of the members of management and audit bodies of our company and people with direct or indirect regular access to the insider information and people with administrative decision-making authority with an impact on the future development and trade goals of the company. Managers and other staff, who have detailed information about a part

of the company affairs and limited information about the entirety, are not considered within the scope of people with access to insider information.

Information regarding such people is filed and updated by Central Registry Agency.

### **Disclosure of Information about Future**

If information requiring a disclosure of material event is disclosed to public, then the assumptions foreseen to be in conformity with the financial standing and results of operations of the company and the data, on which such assumptions are based, shall also be disclosed. In case the estimations and grounds for information about future disclosed to the public do not become actual or in case it is found that they will not become actual, this is disclosed to public immediately along with the relevant reasons.

### **Following the News and Hearsay about the Shareholding**

The news relating to Koç Group in leading national press is followed up through Koç Holding Corporate Communication Directorate. Within this scope, every morning the news is referred to the Senior Managers of the Company and corporate communication department. Moreover, through subscribed data distribution companies such as Reuters and IBS, news about our Company is followed up.

If the company intends to make an explanation about the news and hearsay that appear in the press and media, about which the company does not actually have to make an explanation of special circumstances under the communique, then the matter will be brought to attention by the Assistant General Manager- Accounting and Finance.

### **Fulfilling the Liability to Verify**

In case of news and hearsay in press-media organizations that may have an impact on the investment decisions of the savers or the prices of the capital market tools and that originate from people who are not authorized to represent the company, an explanation will be made as to whether the same is true or sufficient or not. If the stories that appear do not have the nature of insider information, then no explanation will be made. In case of information, which may be considered as insider information and for which no disclosure of material event has been made; an explanation will be made under the communiqué.

### **News about the Information Postponed for Disclosure**

It is a principle to remain silent about any piece of information postponed for disclosure in order to protect the legitimate interests of the Company, if any such piece of news appears in the press despite all the measures taken in order to ensure the confidentiality of the same. However, if it is necessary for protecting the interests of the Company and the investors, then disclosure may take place in relation with any such piece of news.

Throughout the postponement period, no disclosure is made to conflict with the news or no other comment is made. It may be stated that no information may be provided about the process and that a public disclosure will take place when the developments are clear.

### **Ensuring confidentiality of the information that should be disclosed publicly**

Company employees with insider information are liable to protect the confidentiality of such information until disclosure to ISE.

Any information that can be defined as trade secrets gained throughout employment, that is proprietary to the company and that is not wished to be in the domain of anyone other than the people with a need to know, is considered as "Company Information". All the employees protect the company information during and after their employment at the company and they do not use such information directly or indirectly. No company employee may engage in any activities to create gains through the purchase and sale of stocks of our company or any other Koç Group company based on the insider information received due to the position of such employee.

### **Periodical Disclosure of the Financial Statements**

The financial statements of our company are issued within the scope of the provisions laid down by the Capital Market Board. Annual and semi-annual financial statements are subjected to independent audit according to the International Audit Standards and are disclosed to public.

Our financial statements are audited by the Audit Committee and submitted to the Board of Directors for approval before public disclosure under the legislation of the Capital Market Board and any two officials among the General Manager, Assistant General Manager-Accounting and Finance or members of the Board of Directors sign a statement of accuracy and submit it to the ISE. It is announced in the company website as well following release by ISE.

### **Annual Report**

The Annual Report is issued according to the legislation of the Capital Market Board and Corporate Governance Principles and approved by the Board of Directors and disclosed publicly through the company website and ISE by not later than 21 days in advance of the Ordinary Annual General Assembly. Moreover, hard copies thereof may be received from the Investor Relations Department as well.

Interim annual reports issued quarterly are disclosed to public through ISE and offered to the investors on company website.

### **Website**

The website of our company ([www.tatkonserve.com](http://www.tatkonserve.com)) is prepared to contain different information enabling all the beneficiaries to benefit from it. There is a section prepared in order to maintain more efficient and faster communication with the shareholders and investors and to stay in touch with the shareholders at all times; and the contents of such section is determined by the Investor Relations Department. The important issues that may be followed up on the Company's website are summarized below.

- Share Info
- Trade Registry Info
- Articles of Association of the Company
- Shareholder Structure of the Company
- Board of Directors and their Backgrounds
- Company Organization Chart and Backgrounds of Senior Manager
- Date and Agenda of General Assembly and Explanations on the Items on the Agenda
- Sample Power of Attorney
- Minutes of the General Assembly and List of Attendance
- Corporate Governance Principles Compliance Report
- Disclosure Policy
- Human Resources Policy
- Annual Reports
- Profit Distribution Policy
- Periodical Financial Reports
- Disclosure of Material Events for Capital Market Board
- Investor Presentation

### **Press Releases**

In addition to routine disclosures, in cases where the public needs to be informed about various developments that take place, the press is sent written releases. The information sought by the press about the developments and general state of affairs is evaluated in writing and positive or negative feedback is provided.

### **Announcements and Notices Issued through Turkish Trade Registry Gazette and Daily Newspapers**

Under Capital Market Board Code and Code of Commerce and our Articles of Association, the announcements pertaining general assembly, capital increment and payment of dividends are made in the Turkish Trade Registry Gazette and through daily newspapers.

### **Information and Introduction Documents Issued for Investors**

In our company, Investor Relations Department was created under the Assistant General Management of Accounting and Finance in order to maintain regular relationships with both existing and potential shareholders, to respond to the investor questions with the highest accuracy possible and to enhance the company value. Relationships with shareholders take place under the coordination of Investor Relations Department.

The Senior Managers of the Company often meet with the brokerage firms, analysts and investors in order to communicate and introduce the operational and financial performance, vision, strategies and goals, and the added value that our company creates for the investors to the shareholders and analysts.

Investor Relations intends to ensure that the investors are informed in the best manner through tools such as presentations, summary information, website, annual report, meetings with the investors etc., and makes sure that all these tools are prepared, published and updated in conformity with the legislation.

The officials of the company, who strive to meet all the demands for contact throughout the year, regularly attend the meetings organized in Turkey and abroad, and hold meetings with investors to inform them face-to-face. Thus the communication of the shareholders and potential investors with the Senior Management becomes more effective. Presentations of financial results are prepared quarterly in order to ensure that the financial results of the company are communicated in a better way, and they are shared with the investors and analysts by Assistant General Manager – Accounting and Finance through e-mail and website.

### **General Comments about Exercising the Shareholder Rights**

It is made sure that the shareholders are informed about any general assembly, capital increase, dividend payments, merger and split through explanatory notes and announcements within the framework of the Capital Market regulations.

Such documents are also announced in the company website in addition to the channels of announcement as provided for in the respective regulations, enabling easy access to such documents by the investors.