

DISCLOSURE POLICY

1. OBJECTIVE

The purpose of the Disclosure Policy is to share information concerning Verusa Holding A.Ş.'s past performance, future expectations, strategies, targets and vision, excluding any trade secrets, in light of the Group strategy, equally with the relevant authorities, current and potential investors and stakeholders in an accurate, fair, timely and detailed manner through the investor relations and corporate communications departments.

Any changes to the Disclosure Policy will be made available on our website and on Public Disclosure Platform (PDP).

2. SCOPE

This public disclosure policy sets forth the principles applicable to announcements to be made by Verusa Holding (the "Company") in accordance with the applicable regulations.

3. RESPONSIBILITY

The Board of Directors is responsible for preparing, overseeing and updating the Disclosure Policy. The strategies, plans and expectations that are not determined by the legislation, evaluation of past performance, and sharing of the target and vision can be made by the members of the Board of Directors.

4. PUBLIC DISCLOSURE METHODS AND INSTRUMENTS

The Company uses the following methods and tools for informing the public in accordance with its Disclosure Policy:

- Material event disclosures and Corporate General Information Form available on Public Disclosure Platform, (PDP) (www.kap.gov.tr),
- Periodic financial statements, annual and interim activity reports and declaration of interest by Independent Board Members available on PDP,
- Corporate web site (www.verusa.com.tr),
- Informatory documents and presentations prepared for the investors,
- Announcements and notices that are published in the Turkish Commercial Registry Gazette and daily newspapers ,
- Press releases in the printed or visual media,
- Communication tools such as telephone, electronic mail, telefax.

5. MATERIAL EVENT DISCLOSURES

Investor Relations Department provides the Public Disclosure Platform with information about material events as required by the Public Disclosure Communique (VII-128.6), the Material Events Communique (II-15.1), and other pertinent regulatory requirements.

Material disclosures are available on the company web site www.verusa.com.tr, on Borsa Istanbul web site www.borsaistanbul.com, and on Public Disclosure Platform web site www.kap.gov.tr.

Investor Relations Department and the Board of Directors are authorized and responsible for ensuring the confidentiality of material event disclosures until the information is disclosed.

6. CORPORATE WEB SITE

For public disclosures the Company uses the corporate website which contains information and data determined by the regulatory authorities and required by the principles of corporate governance.

The profile and history of “Verusa Holding A.Ş.”, the Company contact information, shareholder structure, trade registry information, article of association, material event disclosures, proxy form for general assembly, information about members of the board of directors, financial statements and interim and annual activity reports, corporate governance compliance report, profit distribution policy and disclosure policy information are made available on the corporate web site. The company applies the utmost importance to all information provided on the website to be updated continuously.

7. PUBLIC DISCLOSURE OF FINANCIAL STATEMENTS

Verusa Holding A.Ş.'s financial statements and footnotes are prepared in accordance with Turkish Commercial Code, CMB regulations and within the scope of Turkish Accounting/Financial Reporting Standards and are disclosed on Public Disclosure Platform within legal time frame following the approval of Board of Directors.

Publicly disclosed financial statements and related footnotes are then published on the Company's website under a separate section of Investor Relations within 1 business day following the disclosure. These financial statements and footnotes are then available and accessible for further 5 years on the website.

The necessary information related to financial statements and footnotes are available on the web site for investors to track and updated continuously.

All questions and requests received from shareholders regarding the firm are responded by telephone or electronic mail without any discrimination.

8. PUBLIC DISCLOSURE OF ANNUAL AND INTERIM REPORTS

Verusa Holding A.Ş.'s annual and interim reports are prepared in accordance with Turkish Commercial Code and within the scope of Corporate Governance Principles of CMB regulations and are disclosed on Public Disclosure Platform within legal time frame following the approval of Board of Directors.

Publicly disclosed annual and interim reports are then published on the Company's website under a separate section of Investor Relations within 1 business day following the disclosure. These annual and interim reports are then available and accessible for further 5 years on the website.

9. ANNOUNCEMENTS AND NOTICES IN THE TURKISH COMMERCIAL REGISTRY GAZETTE

General Assembly Meeting Agenda, Proxy Forms, General Assembly Meeting Minutes, Board resolutions on increase of capital and changes in articles of association of the Company are disclosed to public and published in the Turkish Commercial Registry Gazette.

10. MONITORING NEWS AND RUMORS ABOUT THE COMPANY THAT APPEAR IN THE MEDIA ORGANS

The company monitors news and rumors about Verusa Group circulating on the market and that appear in the media organs and websites on a regular basis.

In principle no announcement is issued by the Company on unfounded news, market rumors and speculations that are not related to Verusa Holding.

In the case of news or rumors about Verusa Holding A.Ş. that may potentially affect the investment decisions or the price of the capital market instruments, appearing in press or any other forms of media that appear not to be sourced from people authorized to make public disclosures on behalf of Verusa Holding, an announcement is made as to whether this information is correct or sufficient in accordance with CMB regulations.

However, in circumstances that Verusa Holding takes postponement decision on a material event disclosure, no announcement is issued until the ground for postponing the announcement is no longer valid.

If the news does not have significance in terms of insider information, no announcement is issued by relevant parties who are authorized to disclose the public information on behalf of Verusa Holding.

11. PUBLIC DISCLOSURE OF FORWARD LOOKING STATEMENTS

Verusa Holding may disclose its future expectations publicly from time to time in accordance with the disclosure policy.

It is clearly stated that future assessments disclosed publicly along with the assumptions related to potential risks, uncertainties and other variables may significantly vary from actual results. Future assessments shall be made to public only by people authorized to make public disclosures on behalf

of Verusa Holding at PDP in the material disclosure format or presentation format. Future expectations are made based on reasonable assumptions and estimates and are disclosed together with references to real benchmark data. Expectations may not contain baseless, exaggerated predictions and it cannot be misleading and is associated with the financial status and results of operations of Verusa Holding.

In case material discrepancies arise between the expectations disclosed and the realizations, the reasons of those discrepancies are explained in the forward looking statements and the revised expectations are immediately disseminated to the public through material event disclosures.