

## **SODA SANAYİİ A.Ş.**

### **Information Policy**

#### **General Framework**

Soda Sanayii A.Ş. (Soda) performs all kinds of financial informative activities as well as other disclosures and informative activities with regard to primarily the Legislation on Capital Markets and the Turkish Commercial Code and the Legislation on Istanbul Stock Exchange where our shares are traded, by observing also the generally accepted financial reporting standards and the Corporate Governance Principles and; Soda carries out a detailed information and public disclosure policy within this scope.

The primary objective of the information policy is to ensure that the required information and disclosures, except for those that are included in the scope of trade secrets, are transmitted to the shareholders, investors, employees, customers and other concerned parties in such a manner that is timely, correct, complete, understandable, easy and with the lowest costs and under equal conditions.

Soda, which follows an active approach in terms of adopting and implementing the Corporate Governance Principles, uses maximum effort also for the accomplishment of the requirements stipulated by the relevant legislation and international best practices with regard to the public disclosure and information. Soda's information policy has been prepared within the scope of the aforementioned framework and, it has been approved and put into practice by the Board of Directors.

#### **Authorization and Responsibility**

The Information Policy has been created by the Board of Directors. In Soda, the Board of Directors is authorized and responsible for monitoring, observing and development of public disclosure and the information policy.

The directors responsible for the financial management and reporting as well as the Investor Relations Department have been assigned for coordination of the information function. The mentioned officials fulfil the requirements of these responsibilities in close cooperation with the Audit Committee and the Board of Directors.

#### **The Studies Conducted and the Methods and Instruments Utilized in the Public Disclosure**

Within the framework of the Legislation Capital Markets, the Turkish Commercial Code and other relevant legislation; the studies conducted and the methods and instruments utilized in the public disclosure are as follows:

- At the ends of quarterly periods; financial reports prepared in compliance with the legislation published by the Capital Markets Board (CMB) on a consolidated basis and the footnotes and disclosures regarding the relevant financial statements as well as the independent audit report prepared at the ends of the half-years and year-ends and, the Board of Directors' report for the interim period are, within the stipulated legal periods, transmitted to the Public Disclosure Platform (PDP) and, are published on our Company's Corporate Web Site at ([www.sisecamkimyasallar.com](http://www.sisecamkimyasallar.com)).The relevant financial statements are, under the affirmative opinion delivered by the Audit Committee, submitted to the Board of Directors for approval and; they are, under attestation, signed by our Company's directors, who are responsible for financial reporting and authorized by the Board of Directors.

With regard to the activity results disclosed in the quarterly periods; the results of the activities realized during the relevant period and the other significant matters are disclosed to the public by way of a making a separate statement to the press by the officials of the Parent Company. The financial statements disclosed to public are also translated into English and thereby, they are forwarded to the concerned parties and, are published on Soda's web site. Following disclosure of the financial statements pertaining to the year-ends; a general evaluation on the previous year is carried out at press meetings organized by the Chairman/Chairwoman of the Parent Company's Board of Directors and/or General Manager on the dates when the Ordinary General Assembly meetings are held and; thereby, any questions asked by the press members are replied.

- Special case disclosures, which should be released within the scope of the legislation on the Capital Markets Board, are, in electronic environment, transmitted to the Public Disclosure Platform (PDP) in the designated period of time. Special case disclosures are, in principle, signed and submitted to the relevant authorities by the persons who are responsible for financial reporting and possessing the "qualified electronic certificate." The persons, who are responsible for the release of special case disclosures, are designated from among the

persons authorized to represent and bind the Company. In addition; the disclosures, which have been sent to PDP in electronic environment, are also published on the Company's Corporate Web Site at the latest on the business day following the date when the public disclosure has been released.

- In the cases such as Amendment on the Articles of Association, General Assembly meetings, and capital increase; the required announcements are made by means of the Trade Registry Gazette and two daily newspapers that are published throughout Turkey. In addition, these texts are published on our Company's web site.
- Annual activity report is, every year, prepared prior to the General Assembly meeting, in such a way that it shall contain the required information and disclosures in Turkish and, is submitted for review of the shareholders and, is published on our Company's Corporate Web Site and; the printed form of the mentioned report can be obtained from the Soda's Shareholder Relations Department. In addition, annual activity reports are also translated into English as soon as possible after General Assembly meetings and, are submitted to the respective bodies and, are published on our Company's Web Site.
- When necessary; press statements are issued through the written and visual media. Press statements are issued to the written and visual media by the authorized persons.
- Information is, through the teleconferences held when required, provided with the shareholders and the other concerned parties. Such teleconferences are coordinated by the Shareholder Relations Department.
- By way of the investor visits (road – show) and investor meetings organized in the country and abroad; information is provided with the shareholders and other concerned parties. The Chairman/Chairwoman of the Board of Directors, the directors responsible for the financial management and reporting as well as the directors of the Shareholder's Relations Department, within the bounds of possibilities, participate in the mentioned meetings and visits conducted by the Shareholder Relations Department. In cases where necessary, the said contact teams can be expanded further.
- In order to ensure that all the market participants have, simultaneously and equally, information about the presentations and reports disclosed through the introductory and information meetings held with the investors as well as the press meetings; these presentations and reports are available also in the "Investor Relations" section on our Company's Corporate Web Site.
- By way of e-mails; the institutions that prepare research reports on shareholders and our Company are, upon request, provided with the relevant information and particularly the financial statements, by the Shareholder Relations Department.

## The Shareholder Relations Department

In order that the obligations arising from the Legislation on Capital Markets can be fulfilled within the framework of the rules set by the legislation and that, the activities can be continued more effectively; a central understanding has been adopted and; a conforming structuring has been preferred in our Group. In this context; all of its obligations, which arise from the Turkish Trade Legislation and the Legislation on Capital Markets, are, since before now, fulfilled under the supervision, direction and coordination of the Shareholder Relations Department constituted within the body of the Parent Company's, namely Şişecam's Financial Operations Group Presidency, in line with the CMB's Corporate Governance Principles.

"The Shareholder Relations Department", which has, in addition to the Company's bodies, compulsorily been constituted as required by the legislation, plays an effective role in the protection of and facilitating the exercise of the shareholding rights and, particularly, the right to obtain information and to review.

Very detailed information and data regarding our Company are, within the scope of the corporate governance portfolio, contained in Turkish in the Shareholder Relations section on our Corporate Web Site. The mentioned web site is monitored and kept up-to-date by the Shareholder Relations Department. All kinds of questions, which are directed by the means of communication, such as email, letter and telephone, by the shareholders and the other concerned parties, are replied as soon as possible and under the coordination of the Shareholder Relations Department.

Within this scope, the primary activities carried out under the responsibility of the Shareholder Relations Department are summarized as follows:

- a) To meet the verbal and written information requests of the shareholders, provided that the information regarding the Company, however, not disclosed to the public and are confidential and are in the nature of a trade secret are excluded.
- b) To hold the General Assembly Meetings in compliance with the legislation in force, the Articles of Association and other internal arrangements pertaining to the Company.
- c) To prepare the documents that the shareholders will be able to utilize at the General Assembly meetings.
- d) To ensure that the records of the voting results are kept and reports regarding the results are sent to the requesting shareholders.
- e) To ensure that all kinds of matters regarding the public disclosure, including the Legislation and Company Information Policy, are supervised and monitored. f) To keep the records regarding the shareholders accurately, securely and up-to-date.
- g) To furnish information to the investors by participating in the meetings held in the Company Headquarters as well as the conferences and meetings organized by various institutions domestically and internationally.
- h) To furnish information to the analysts who conduct assessments regarding the Company.
- i) On up-to-date basis, on the Company's Corporate Web Site; to present the shareholders the information and disclosures that may affect the exercise of the shareholding rights.
- j) By taking into consideration of CMB's Communiqué Series VIII, Nr.54; to transmit the Special Case Disclosures to ISE (Istanbul Stock Exchange) through PDP (Public Disclosure Platform) and thereby, to furnish information to the public.
- k) To follow up the amendments on the Capital Markets Law as well as the relevant legislation and, to present them for the attention of the Company's concerned departments.

For these purposes; the Departments' officials, who are responsible for ensuring communications with the shareholders, have been designated as follows:

<u>Name and Surname</u>	<u>Position</u>	<u>Telephone</u>	<u>E-mail</u>
Umut Barış Dönmez	Financial Affairs Director	0850 206 57 97	bdonmez@sisecam.com
Asuman Durak	Financial Affairs Specialist	0850 206 36 90	asdurak@sisecam.com
Arzu Beler	Financial Affairs Specialist	0850 206 36 34	abeler@sisecam.com

### **The Measures Taken for Ensuring Confidentiality of the Relevant Information, Until Such Time As Special Cases are Disclosed to the Public**

For ensuring the confidentiality until such time as the special cases are disclosed to public, the Soda employees who have access to the internal knowledge are informed comprehensively about their responsibilities arising from the relevant legislation and about which information will be disclosed to the public, under what circumstances, and by whom. In the agreements entered into with the persons and institutions that may have access to the internal knowledge due to provision of a particular service to Soda; a confidentiality Article is contained when necessary.

In addition, in order to prevent any unauthorized disclosures on the activity results; no information is shared with the capital market participants about the activity results that have not been disclosed to the public in the particular periods of the calendar year and about the other matters. Such period is regarded as the "silent period." Throughout the Silent Period, the Company's authorized personnel do not state their views about the Company's financial condition except for the information that have been disclosed to the public on behalf of the Company. The questions of the capital market participants, such as analysts and investors, regarding the financial condition are not replied. In the Silent Period, there is no restriction for the persons who are authorized to make disclosures to the public on behalf of the Company, to give speeches by participating in conferences, panels, and similar events, to interview with the written and visual media, provided that they comply with the principle of confidentiality of the internal information and; there is no restriction for the authorized persons from the Shareholder Relations Department to participate in the investor meetings by complying with the rules on the confidentiality of the internal information. The Silent Period starts in quarterly intervals and on the 15th day of the month following the month when the annual accounting period has ended and, continues until such time as financial statements are disclosed to the public.

### **News and Hearsays that take place in the Media**

The follow-up and tracking of the news and hearsays about Soda and its subsidiaries, which take place in the media organs or on web sites are carried out through a professional media follow-up agency. Within this framework, in the event that the requirement to disclose special cases to the public within the scope of the legislation on public disclosure of the special cases arises, the required information is compiled from the concerned departments and thereby, the relevant disclosure is released.

While making statements on the news and hearsays which take place in the media organs and however, do not create an obligation to release a special case disclosure pursuant to the relevant legislation; the matters such as the nature of the news, broadness of the mass reached by the media organ and, whether or not the news has affected the reputation of the Company, are taken into consideration and, thereby, the method and contents of the statement are determined. In the cases where a statement is made with respect to such news and hearsays and; in the event that the contents of the statement contain an item giving rise to the requirement of public disclosure, the relevant special case disclosure is also released in line with the provisions of the relevant legislation.

In the event that news and hearsays take place in the media organs and the public opinion with the importance that may affect the resolutions of Soda, investment decisions of investors or the values of the Capital Market instruments, not resulting from the persons authorized to represent the Company, and in such a content different from the information made public previously by way of a special case disclosure, registration statements, circular, announcement texts approved by the CMB, financial reports, and other public disclosures; it makes a statement on whether or not they are true and adequate. However, it does not deliver any opinions on comments, evaluations and estimations/predictions which have been carried out about the Company based on the information disclosed to the public.

### **Criteria used in the Designation of the Persons having Administrative Responsibility**

While the individuals with administrative responsibility are designated; the tasks of the persons within the Company organization and, the content of the information accessed by such persons are taken as a criterion.

Within this scope; the members of the Board of Directors and the Board of Auditors, Group Presidents and Directors, Vice Presidents, who have detailed knowledge about the entirety of Soda and not only for the current circumstance but also for the future plans, as well as Soda's financial and financing department managers, who have the access to the knowledge regarding the entirety of Soda and are authorized to make administrative decisions that may affect the financial reports, strategic targets and similar factors at a macro level, are designated as the persons who have administrative responsibility and access the internal knowledge regularly. Accordingly; the directors and other

personnel, who do not possess the knowledge at such a level that may affect the value of the capital market instruments and investment decisions of investors; in other words, those who possess knowledge regarding only a part of the Company and with limited knowledge regarding the entirety thereof, are not considered as a person who has administrative responsibility and has access to the internal information.

#### **Other Notifications**

The notifications other than what is mentioned above (registration statement/prospectus, circular etc.) are signed within the scope of the powers determined in the Company's circular letter and, they are disclosed to the public. They are also published on the web site of our Company.

#### **Soda's Corporate Web Site ([www.sisecamkimyasallar.com](http://www.sisecamkimyasallar.com))**

The Company; in order to continue its relations with the shareholders more effectively and rapidly and, to be in continuously in touch with them, uses the Company's Corporate Web Site actively and as stipulated by CMB's Corporate Governance Principles. The information available on this site is continuously updated under the responsibility of the Shareholder Relations Department. The information available on the Company's Corporate Web Site have the same content with the disclosures released within the framework of the provisions contained in the relevant legislation and, they do not contain conflicting or incomplete information.

On the Company's Corporate Web Site; in addition to the information, the disclosures of which are mandatory as per the legislation; trade registration information, the latest partnership and management structure, the fact that there is no preference stock, date and issue number of the trade registry gazette in which the amendments are published as well as the latest version of the Company Articles of Association, special case disclosures, financial reports, activity reports, registration statements (prospectuses) and public offering circulars, agendas of the General Assembly meetings, lists of participants and meeting minutes, voting by proxy form, Profit Distribution Policy, Information Policy, Company's Codes of Conduct and, the answers given to the frequently asked questions are made available. Within this scope, the information pertaining to minimum the last 5 years is available on the Company's Corporate Web Site. The financial reports and activity reports available on the web site are also prepared in English so that they are also utilized by international investors.