AYGAZ A.Ş.

Disclosure Policy

1. PURPOSE AND SCOPE

The purpose of this Aygaz A.Ş. Disclosure Policy, is to determine the methods and principles that Aygaz will use to share information and developments, other than trade secrets, that may affect the price of its shares or the investors' decision, including operational and financial performance and expectations, in a timely, accurate, complete, direct, understandable, adequate and easily accessible manner and in accordance with the principle of equal treatment.

While following an active and transparent disclosure policy, Aygaz A.Ş. ("Aygaz"), in accordance with Koç Group and Aygaz Code of Ethics, complies with the applicable legislation, especially the Turkish Commercial Code (the "TCC") and the Capital Markets Board (the "CMB") and the Borsa Istanbul ("BIST") regulations in all matters related to public disclosure, and aims to implement an effective disclosure policy.

2. METHODS AND TOOLS

2.1. Authorized Persons for Disclosure (Spokespersons)

In principle, with the exception of the forms, declarations and reports signed in accordance with the signature circular, the announcements and disclosures to be made on behalf of Aygaz A.Ş. within the framework of the above-mentioned purpose and scope, shall be made by members of the Board of Directors, General Manager, Assistant General Manager (Finance) or the Corporate Communications Manager.

In addition, the Investor Relations Department (the "IRD"), established under the Assistant General Manager (Finance) and consisting of the Assistant General Manager (Finance), the Finance and Risk Director and the Investor Relations Manager, can communicate on behalf of Aygaz A.Ş. for explaining Aygaz to existing and potential investors, intermediary institutions and financial institutions domestic and abroad, meeting incoming information inquiries, including those of analysts and financial experts working in such institutions and answering questions submitted to them within the framework of investor relations.

2.2. Tools Used for Disclosure

As per the CMB and BIST regulations and the TCC, Aygaz. uses the following communication methods and tools for public disclosure within the Disclosure Policy:

- Material event disclosures and company general information form announced on the Public Disclosure Platform (the "PDP").
- Financial statements, independent audit reports and activity reports announced in the PDP.
- Corporate Governance Compliance Report and Corporate Governance Information Form announced in the PDP.
- Corporate website (www.aygaz.com.tr) and corporate applications on digital platforms,
- Information and supportive documents prepared for investors; presentations about the company and earnings release reports,
- Investor and analyst meetings; interviews and meetings with capital market participants, including those in the digital platforms,
- Prospectus, circulars, issuance documents, announcements and other documents to be

prepared in accordance with the CMB regulations,
- Press releases made in the printed, visual or digital media,
- e-Company and e-GKS (Electronic General Assembly System) platforms of the Central Registry Organization (Merkezi Kayıt Kuruluşu -“MKK”)
- Declarations and announcements made through the Turkish Trade Registry Gazette and daily newspapers.

Depending on the nature of the disclosure, it is possible to use only one of these methods and tools, as well as use more than one tool if and when necessary.

2.3. Activities Carried Out by the Investor Relations Department

The Investor Relations Department of Aygaz A.Ş. regularly communicates with both existing and potential shareholders, analysts and capital market experts, to respond the inquiries of investors and other capital market participants in the most efficient way and makes necessary disclosures to ensure the capital market instruments of the company traded in the financial markets achieve their fair value. The Investor Relations Department manages the communication with shareholders and all other stakeholders in order to avoid asymmetric distribution of information and to ensure the distribution of information in an easily accessible, understandable, analysable, timely and accurate manner.

The primary purpose of the Investor Relations Department is to conduct the mutual relationship between the company and investors in the most effective way. In this context, the Investor Relations Department serves as a bridge between the company's senior management and investors. On one hand the investors are informed on the investment case, on the other hand, periodic reporting is carried out in order to notify senior management on investors’ evaluation and feedback. Hence, a two-way communication is facilitated.

Disclosure Meetings

In order to ensure that operational and financial performance, vision, strategy and goals of Aygaz A.Ş. , and the value created for its stakeholders are best explained and presented to investors and analysts, the senior managers of Aygaz A.Ş. and the Investor Relations Department officials often meet with capital market participants such as brokerage firms, analysts, investors.

The representatives of the Investor Relations Department, who strive to meet all the interview requests that they receive during the year, also regularly attend face-to-face or digitally organized conferences and meetings in Turkey and abroad. In addition, it also holds one-to-one meetings with investors. From time to time, the General Manager and Assistant General Manager (Finance) may also participate in these meetings, hereby facilitating more effective communication between senior management and existing and potential investors.

In order to ensure effective financial communication, presentations are prepared on the financial results on a quarterly basis, and analyst meetings or teleconferences are held with the participation of the Assistant General Manager (Finance), Finance and Risk Director and the Investor Relations Manager to respond investors’ and analysts’ questions.

The dates of the teleconferences and meetings that Aygaz A.Ş. will hold with analysts and investors domestic and/or abroad are disclosed to public on corporate website of Aygaz A.Ş. (www.aygaz.com.tr) for investors. The investor presentation published on the website, is also used in these meetings. In addition, teleconferences and webcasts are held to enable wide access and the transcript of such webcasts is published on the website.

Information and Supportive Documents

While aiming to inform investors in the best way possible by using the tools such as presentations, investor bulletins, summary financials, website, annual and interim reports, teleconferences, investor meetings, corporate applications on digital platforms, etc., the Investor Relations Department ensures that all these tools are prepared, published and updated in accordance with the legislation.

With the regularly updated website and information notes made available to investors on the website, it is also aimed that capital market participants can closely follow the developments related to our Company and access investor relations tools. Explanations regarding the activity reports and content of the websites are included in the relevant section below.

A list of analysts covering Aygaz and their contact information are available to investors in the investor relations section of Aygaz corporate website. Aygaz A.Ş. has no authority or responsibility to review, verify or approve analyst reports or models.

Information Requests

To ensure that the shareholders, investors, analysts and other capital market participants exercise their right to receive information effectively, the Investor Relations Department responds as soon as possible to any questions, complaints, opinions and suggestions related to or for the evaluation of existing information disclosed to public within the scope of this Policy, received via telephone and e-mail, and ensures that the information in the “Investor Relations” section of the Aygaz A.Ş. website is disclosed and updated in a timely manner.

Website

The “Investor Relations” section of Aygaz A.Ş. website is allocated to the financial and non-financial information that existing and potential investors and analysts may need in the valuation of company shares or in the monitoring of the performance of Aygaz A.Ş. and is actively used in public disclosures. The majority of the information found on the website is prepared in Turkish and English and is always kept up-to-date.

Corporate Communications Department is responsible for coordination of the design and content of the Aygaz A.Ş. website. The content of the website is prepared in such a way that it may contain various information that all stakeholders can use.

Determination and management of the content in the investor relations section is under the authority and responsibility of the Investor Relations Department. This section is a platform where investors and analysts can monitor the detailed and comprehensive information they will need to evaluate the company and monitor the performance of the company and the share.

In addition to the information and documents envisaged to be included within the scope of investor relations and legal mandatory requirements as per TCC and Corporate Governance Principles, the website also includes all the policies and practices of Aygaz A.Ş. such as "Dividend Policy", "Disclosure Policy", "Remuneration Policy" and " Code of Ethics ", as well as analysis and evaluations; historical information and statistics.

3. POLICIES ON MATERIAL EVENT DISCLOSURES

3.1. Responsibility

The fulfilment of the material event disclosure obligation of Aygaz A.Ş is under the authority and responsibility of Assistant General Manager (Finance), and acts in coordination with the relevant departments, especially the Legal and Compliance Directorate,

In principle, material event disclosures are made in Turkish and English via the Public Disclosure Platform (PDP) with any two of the electronic certificates of the Assistant General Manager (Finance), Finance and Risk Director and Affiliates and Accounting Director . However, if the electronic certificate of any of these people cannot be used, it is also possible to use electronic certificates of other authorized managers. The material event disclosures are also published on the corporate website after disclosures are made public via PDP.

3.2. Persons with Administrative Responsibility

At Aygaz A.Ş., list of persons with administrative responsibilities includes members of the Board of Directors of Aygaz A.Ş. , as well as the persons, who have directly or indirectly regular access to insider information related to Aygaz A.Ş. and who have the authority to make administrative decisions that affect the future development and commercial objectives of Aygaz A.Ş. Persons, who have regular access to information and also have the authority to make administrative decisions other than the members of the Board of Directors of the Company, consist of General Manager, Assistant General Managers and Directors who are related with the main operations of the Company and reporting directly to the General Manager as well as its main shareholder Koç Holding's board members CEO, Energy Group President, Audit Group President, CFO, the Directors, the Chief Legal and Compliance Counsel and the General Secretary.
Up-to-date information on persons with administrative responsibilities within the company is available at www.aygaz.com.tr.

3.3. Public Disclosure of Inside Information

For all matters required by the capital market legislation on Aygaz A.Ş. and for significant changes in the operations or financial, management or capital structures of non-public subsidiaries of Aygaz A.Ş., Aygaz A.Ş. shall immediately make a public disclosure through the PDP, except in cases where the public disclosure is postponed. Unless legally mandatory to do so, information disclosed to the public shall not contain information that may adversely impact competitiveness of Aygaz and damage shareholders and other stakeholders' interests. Trade secrets shall not be disclosed.

The Investor Relations Department and the Corporate Communications Department may only make an announcement after the public disclosure at the PDP.

3.4. Ensuring the Confidentiality of Insider Information

Aygaz A.Ş. employees and other parties contacted in possession of inside information are informed of their obligation to keep such information confidential during the occurrence/ the development of the inside information and until its public disclosure in principle in writing or via e-mail.

As a general principle, Aygaz A.Ş. employees and third parties acting on behalf of Aygaz A.Ş. shall not share any information, deemed as inside information, which has not yet been disclosed to the public, with third parties. If the company determines that those who are in possession of inside information disclosed such information to third parties without the prior knowledge of the company, and the confidentiality of information shall no longer be ensured, as per the CMB regulations, the company shall make a material event disclosure.

If the disclosure of information is postponed, persons with access to the subject information at the time of postponement are informed about their obligations and sanctions that may be applicable in case of breach. In addition, any contract entered into with third parties who has/will have access to any inside information shall contain confidentiality provisions to ensure that such parties take the necessary measures to prevent any confidentiality breach.

3.5. Postponement of Public Disclosure of Inside Information

Aygaz A.Ş., at its own risk, may postpone the public disclosure of inside information in order to protect its legitimate interests, as long as this does not cause investors to be misled and it is able to ensure the confidentiality of such information. In this case, Aygaz A.Ş. shall take all possible measures to ensure the confidentiality of inside information in accordance with the capital market legislation. In cases where no special decision, has been taken by the Board of Directors that includes the postponement of information, the General Manager authorized by the Board of Directors of Aygaz A.Ş., will decide on whether the disclosure of information will be subject to postponement, by taking the opinions of the Assistant General Manager (Finance) and other relevant executive management.

3.6. Fulfilment of Verification Obligation

Aygaz A.Ş. works with a media-monitoring agency to screen domestic news and content about Aygaz appearing in national media, digital and social media platforms. Every morning, Executive Managers, the Investor Relations Department and the Corporate Communications Department receive relevant news. News appearing in the subscribed data broadcast channel are also followed.

If there are any news or rumours appearing in media etc., that contains information that is either different than what was previously disclosed to the public or makes any information public for the first time, potentially material enough to affect the value of Aygaz A.Ş.'s capital market instruments or the investors' decisions, a disclosure shall be made to confirm the accuracy or deny the relevant news. For such assessment, the following principles, as well as the circulation or level of recognition of such media channel shall be taken into account. The comments, analyses, assessments and estimates based on publicly disclosed information about Aygaz are not in scope of this obligation.

In the evaluation as to whether a material event disclosure will be made within the scope of the verification obligation, the circulation or awareness of the media in which the news is published is taken into consideration.

The following principles apply in fulfilment of the verification obligation by Aygaz A.Ş.:

a. If the news is not important enough to be deemed as inside information, in principle, no disclosure is made about the subject. However, Investor Relations and Corporate Communications Departments evaluates whether there is any benefit in organizing a press release on such a subject, which does not require a material event disclosure as per CMB regulations.

b. If a material event disclosure or any other means of disclosure in accordance with CMB regulations has already been made about the news, no action is taken.

c. In principle, no comment is made regarding the questions from the media about inside information, the disclosure of which is postponed, or the issues that are not on the company agenda, as well as rumours and news, which are obvious to be unfounded.

d. In case of inaccurate news or news that contain significant errors or deficiencies, that may be regarded as material information or that may potentially affect the investment decisions or the price of the capital market instruments, a material event disclosure is made about the subject.

e. If the news published in the press is about a case the public disclosure of which was postponed;

- If the news contains accurate and important information that may affect the investor's decisions, it is assumed that the reasons for postponement limited to the information in question are no longer valid and, limited to this information, a disclosure is made immediately.
- If the news contains information that is incorrect, erroneous or has significant deficiencies, a disclosure shall not be made, as there will be no leakage of inside information.

f. If deemed necessary to protect the interests of Aygaz A.Ş. and its investors, a material event disclosure may also be made for unsubstantiated news or the issues for which the disclosure is considered useful.

g. Independent of the material events disclosure, if deemed appropriate by the Corporate Communications Department, it is possible to make a press release or inform press and public through corporate social media accounts of Aygaz A.Ş..

3.7. Public Disclosure of Forward-Looking Statements

Aygaz A.Ş. can disclose forward-looking statements to the public as per the principles set out in the capital market legislation. For such disclosures, the following principles shall be followed:

- Forward-looking statements along with their main underlying assumptions can be disclosed no more than four times within a year, in principle following the disclosure of quarterly financial statements.
- The disclosure may be disseminated through investor presentations and/or earnings releases (earnings release reports) and/or quarterly activity reports both of which are published on PDP and on the company web site or by means of a material event disclosure if deemed necessary.
- In the disclosure, it shall be explicitly stated that actual results may differ significantly from the expectations due to possible risks and uncertainties, as well as other factors.

- If the expectations and assumptions expressed in the forward-looking statements disclosed to the public are not realized significantly or turn out to be impossible to be realized, the revised expectations shall be disclosed to the public through material event disclosures without any limitation in terms of the number of the disclosure.
- In case of significant differences between the expectations previously announced to the public and the actualizations, the reasons for such differences are also included in the forward-looking statements.
- Forward-looking statements may include, but are not limited to, forecasts of investments, market shares, sales volume/turnover expectations, profitability ratios, foreign revenues, and exports.

4. OTHER PUBLIC DISCLOSURE POLICIES

4.1. Exercise of Shareholder Rights

As per the TCC and the CMB regulations and the Articles of Association of Aygaz A.Ş., information and documents such as prospectus, announcement texts, information document about the general assembly, capital increase, dividend payments, and merger and division procedures are disclosed in the PDP within defined periods and shareholders are informed accordingly. In addition to the outlets specified in the regulations, above listed documents shall also be published at www.aygaz.com.tr, the same day, to facilitate investors' access.

4.2. Public Disclosure of Financial Statements

The financial statements of Aygaz A.Ş. are prepared on a consolidated basis in accordance with Turkish Financial Reporting Standards within the framework of the CMB regulations and are disclosed to the public quarterly within the periods determined by the CMB. The annual consolidated financial statements are subject to full scope independent audit and the six-month consolidated financial statements are subject to limited independent audit. The consolidated financial statements and explanatory notes of Aygaz A.Ş., in Turkish and English, can be accessed retrospectively on Aygaz A.Ş. A.Ş website under Investor Relations title.

Before the disclosure to the public, the consolidated financial statements and explanatory notes are submitted to the Board of Directors for approval together with the opinion of the Audit Committee within the framework of the CMB regulations. After the responsibility statement is signed, the financial statements, footnotes, and the independent audit report, if any, are disclosed via the PDP.

In addition to the information disclosed in the consolidated financial statements, additional information such as information notes, earnings release reports regarding financial data and ratios or investor presentations are prepared and disclosed in the website and also distributed via e-mail to those who register from the Investor E-Bulletin Membership. by Investor Relations Department in order to enable investors to perform the analysis they request. In addition to the information disclosed in the financial statements additional information such as sector data regarding Aygaz's field of operations and net cash etc. may be disclosed in the earnings release reports and investor presentations prepared for each financial statement period in order to enable investors to perform the analysis they request.

4.3. Public Disclosure of Activity Reports

Aygaz A.Ş. prepares activity reports for the same periods with its financial statements and discloses them to the public within the defined periods in accordance with the procedures established by the CMB. The contents of the activity report are prepared in accordance with international standards, the TCC, CMB regulations and CMB corporate governance principles. The activity report is prepared by Investor Relations Department and submitted to the Board of Directors for approval together with the opinion of the Audit Committee and disclosed to the public after the approval of the Board of Directors.

Although in principle the activity report is disclosed to public together with the financial statements of Aygaz A.Ş., it may not always be possible to disclose them simultaneously, especially due to the fact that the annual activity report is prepared printed. In this case, the annual activity report is disclosed to public after the financial statements, together with the statement of responsibility in the PDP and on the website of Aygaz A.Ş., at least three weeks before the ordinary general assembly and, in any case, within the period determined within the framework of the CMB regulations.

Accessible on the website in Turkish and English, printed copies of the annual activity report can be obtained from the Corporate Communications and Investor Relations departments of Aygaz A.Ş..

Interim activity reports, prepared quarterly, are disclosed to the public via the PDP and are made available to investors in Turkish and English on the company website.

5. AUTHORITY AND RESPONSIBILITY

The Board of Directors is responsible for the preparation, execution, supervision, amendment and disclosure to the public of the Disclosure Policy, in accordance with the relevant legislation, especially the TCC, CMB and BIST regulations.

The Disclosure Policy, which is approved by the Board of Directors is disclosed to the public in Turkish and English on the PDP and on the corporate website. In case of amendments to the Disclosure Policy, the Policy is updated by the Finance and Risk Directorate and submitted to the Board of Directors' approval. The new policy approved by the Board of Directors is disclosed to the public on the PDP and on the corporate website.

Although the Board of Directors of Aygaz A.Ş. is responsible for the Policy, for execution and implementation of the principles and procedures set out in this Policy, depending on the context, the Finance and Risk Directorate and/or the Corporate Communications Departments of Aygaz A.Ş. are responsible.

Investors and/or stakeholders may submit their questions, complaints, opinions and suggestions within the scope of this Policy of Aygaz A.Ş. to the Investor Relations Department.

6. APPROVAL AND AMENDMENT STATUS

This Policy was approved by the Board of Directors' resolution of of Aygaz A.Ş. numbered 953 and dated 04.08.2021.

With the entry into force of this Policy, the Policies listed in the table below, which have been previously disclosed to the public, are repealed.

Decision of the Board of Directors Approving the Policy		**Disclosure Date of the Policy in the PDP**
Date	**Number**	
July 15, 2015	816	July 15, 2015
February 13, 2018	868	February 13, 2018