



INFORMATION POLICY

**GSD HOLDİNG A.Ş.
(GSD HOLDING INC.)**

20 May 2020

1. Purpose

Our Company's Information Policy has been comprised to inform the public about our Company concurrently, completely, comprehensibly and accessibility with low cost pursuant to Turkish Commercial Code (TCC), Capital Market Law, Capital Market Board (CMB), Regulations of the Borsa Istanbul (BIST) and other relevant legislations. Information Policy involves the data that is not in the scope of trade secrets of Our Company and the data in the condition that there is no prejudice legally to publish them.

2. Authority and Responsibility

Our Company's Information Policy is determined by Our Company's Board of Directors and declared to public via internet site. Information Policy is being prepared pursuant to CMB and BIST Regulations. Corporate Governance Committee and Investor Relations Unit are assigned to coordinate information mechanism.

3. Methods and Instruments Used

Without prejudice to the Regulations of Capital Market Board and Turkish Commercial Code (TCC), methods and instruments used by Our Company are made available to public in "Public Disclosure Platform" (www.kap.gov.tr) and Company's website. Also "e-GOVERNANCE: Corporate Governance and Investor Relations Portal" and "e-COMPANY: Companies Information Portal" of the Central Registry Agency of Turkey is used to inform shareholders directly and efficiently.

a) Disclosure of Material Events

Disclosure of material events pursuant to CMB regulations are prepared clearly in detail adequately when they are occurred or learned and sent to the Public Disclosure Platform (KAP) electronically by Investor Relations Unit. Disclosure of Material Events is available in Investor Relations/Notifications/Disclosure of Material Events Menu in the website of GSD Holding (www.gsdholding.com.tr). Disclosures of Material Events are published in Turkish.

b) Financial Statements and Notes to the Financial Statements

In accordance with CMB regulations, Our Company's consolidated financial statements and notes to the consolidated financial statements, prepared quarterly and audited at the end of 6th month and at the end of the year, are declared to public electronically, after the approval of the Board of Directors, via Public Disclosure Platform (KAP) and published in our website and in e-COMPANY Portal and at the end of the years in e-GOVERNANCE Portal of the Central Registry Agency of Turkey.

c) Annual Reports

Our Annual Reports are prepared by Financial Affairs Department quarterly together with our financial statements in order to inform our shareholders and other stakeholders in detail related with the analyse of the financial data and other matters related to activities and declared to public electronically, after the approval of the Board of Directors, via Public Disclosure Platform (KAP) and then published in our website and E-Governance Portal of the Central Registry Agency of Turkey. Our Annual Reports prepared in accordance with the CMB regulations and CMB Corporate Governance Principles involve detailed information related with our Company's activities, financial structure and financial performance. Our Annual Reports prepared at the end of the year are published both electronically and in print and submitted to our shareholders' examination before 3 weeks from the ordinary general assembly meeting.

d) Website

In accordance with Turkish Commercial Code No. 6102, Our Company's website with domain name www.gsdholding.com.tr, in order to be allocated for the publication of the announcements to be made by law by Our Company and to be assigned to information society services, was registered to trade registry on 27 September 2013 and the announcement was published in Turkish Trade Registry Gazette dated 3 October 2013. As of 1 October 2013 Our Company commenced to get the service, of "Central Data Base Service Provider" via e-COMPANY Portal of the Central Registry Agency of Turkey in order to fulfil the requirements in this context.

GSD Holding is providing service in websites that are www.gsdholding.com.tr, www.gsd.com.tr and www.gsdholding.com. The websites of GSD Holding A.Ş. and its subsidiaries comprises detailed information in both Turkish and English and updated regularly.

In the Investor Relations Menu in our website prepared in Turkish involves the submenus of "Company Information, Independent Auditing Firm, Shareholding Structure, Articles of the Association, Board of Directors, Policies, Internal Regulations, Capital, Announcements in accordance with 198th Article of TCC No. 6102, General Assembly, Financial Statements-Audit Reports, Annual Reports, Corporate Governance Compliance Reports, Investor Presentations, Frequently Asked Questions, Disclosure of Material Events, Share Buyback, Investor Relations Unit, Contact with Committees, Participation in Management" and also on home page "GSD in Retrospect, Board of Directors, Corporate Culture, Data Protection Law".

In our website prepared in English involves the submenus of "Company Information, Independent Auditing Firm, Shareholding Structure, Articles of the Association, Board of Directors, Policies, Internal Regulations, Capital, General Assembly, Financial Statements-Audit Reports, Investor Presentations, Frequently Asked Questions, Disclosure of Material Events in Turkish language linked to Public Disclosure Platform, Investor Relations Unit" and also on home page "GSD in Retrospect, Board of Directors, Corporate Culture".

e) Investor Meetings

Information and meeting requests from shareholders, qualified investor, bank, brokerage firm or other financial service institutions are replied by investor relations unit and other information methods such as press meetings, analyst meeting, etc. are not deemed as necessary. Investor Presentations for general information purposes are available in the “Investor Presentations” submenu of the Investor Relations Menu in the Turkish and English website of our Company.

f) Monitoring the News and Rumours Related With Our Company

As a principle, we do not comment on all the rumours or speculations related with our Company occurred in the press or internet. If the news and comments in the reputable press organs are misleading the public or if it is needed to make a disclosure of material event pursuant to CMB regulations, disclosure of material event prepared by Investor Relations Unit is declared electronically to public via Public Disclosure Platform (KAP) and published in the website of Our Company. It is foreseen that relating with the news and rumours occurred in press which do not impose an obligation to make disclosure of material event pursuant to Communiqué on Material Events Disclosure (II 15.1), if it is requested from Our Company to declare information and there is no inconvenience legally, the information will be published in the Investor Relations section of our website.

4. Determination of Individuals Who Have Administrative Responsibility

Individuals who have administrative responsibility determined in the Communiqué on Material Events Disclosure (II 15.1) are the members of the board of directors, general manager and assistant general managers if exist.

5. Privacy of the Information Which Will Be Declared to Public

Our Company aims to allow the access of all kind of information which can be subjected to the Disclosure of a Material Event as possible as for limited number of individual. The individuals who have the information by their position or duty are warned that this information must be kept secretly until they are declared to public and the individuals are informed about the legal consequences of contrary behaviours.

6. Postponement of Declaration of Internal Information to Public

Our Company, on its own responsibility, may postpone the declaration of internal information to public in order to avoid damage to legitimate its interests on the condition that should not cause mislead of public and Our Company must provide the privacy of this information. Internal information is declared to public immediately when the reason for postponement of declaration of internal information to public disappears. The resolution of postponement and the underlying reasons are indicated in the declaration. When Our Company decides to postpone the declaration of internal information to public, the postponement of suspended information's effect to protection of Our Company's legal rights, the risks not causing the mislead of investors and the precautions taken for the privacy of the internal information during the postponement are subjected to written approval of the resolution of the Board of Directors or the individual authorised by the Board of Directors.

7. Public Disclosure of Forward Looking Statements

1) Forward looking statements are not required to be disclosed to public. However, if Our Company wish to disclose its forward looking statements to public, the following principles are required to be abided by:

a) Forward looking statements may be disclosed to public only if and when they are relied upon a decision of the board of directors, or if the board of directors delegates this power, a prior written consent of the designee of the board of directors.

b) Forward looking statements are disclosed by Our Company's management to public not more than four times a year. This disclosure may be made in the form of a public disclosure of material events, or through activity reports published within the frame of regulations of the Board pertaining to financial statements or through presentations for information of investors, providing that it is further published in Public Disclosure Platform (KAP). However, in the case of a significant change in the forward looking statements disclosed to public, the disclosure is required to be made within the frame of provisions of Communiqué on Material Events Disclosure (II 15.1), without being subject to the limitation of number set forth in this paragraph.

c) In the case of a significant difference among previous public disclosures and actualization, the disclosure relating to forward looking statements further contains the reasons of such differences.

8. Validity

This Information Policy has become valid from the date of 29 April 2009 and has been updated as of 20 May 2020.



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