

KONRUT TARIM A.Ş.

DISCLOSURE POLICY

1. PURPOSE AND SCOPE

The purpose of the Konfrut Tarım A.Ş. ("Konfrut" or "the Company") Disclosure Policy is to determine the methods and principles to be used to announce information and developments that may affect the share price or investment decisions of investors—excluding trade secrets—including the Company's past operational and financial performance, strategies, targets, vision, and forward-looking evaluations, in an equal, accurate, direct, complete, sufficient, understandable, and timely manner. Konfrut aims to implement an effective and transparent disclosure policy that meets the expectations of its stakeholders by complying with the Turkish Commercial Code ("TCC"), Capital Markets Board ("CMB"), and Borsa İstanbul A.Ş. ("BIST") regulations and current legislation regarding public disclosure.

2. AUTHORITY AND RESPONSIBILITY

The Disclosure Policy has been established and approved by the Company's Board of Directors within the framework of the CMB's Corporate Governance Principles. The Board of Directors is responsible for preparing, executing, auditing, updating when necessary, and publicly announcing the Disclosure Policy in accordance with the relevant legislation. The Investor Relations Department, established under the Financial Affairs Directorate, and the Corporate Communications Department, operating under the Human Resources Directorate, along with the Company General Manager, are responsible for the implementation of the principles and procedures set forth in this Policy, depending on the subject matter.

3. DISCLOSURE METHODS AND TOOLS

Within the framework of CMB and BIST regulations and TCC provisions, the communication methods and tools Konfrut may use for public disclosure are as follows:

- Financial statements and footnotes, independent audit reports, activity reports, and declarations published periodically on the Public Disclosure Platform ("PDP/KAP"), and material event disclosures published on the PDP.
- Corporate Governance Compliance Report, Corporate Governance Information Form, Sustainability Principles Compliance Report, etc., published on the PDP.
- Konfrut's corporate website (www.konfrut.com.tr) and applications on digital platforms.
- Company introductory presentations, information, and promotional documents prepared for investors.

- Informational meetings and teleconferences held with capital market participants and investors.
- Press releases made through written and visual digital media.
- Prospectuses, issuance certificates, announcement texts, and other documents prepared within the scope of CMB regulations.
- Announcements and notifications made via the Turkish Trade Registry Gazette (circulars, general assembly calls, etc.).
- Central Registry Agency's (CRA/MKK) e-MKS, e-Company, and e-GKS platforms.

4. INVESTOR RELATIONS DEPARTMENT ACTIVITIES

The Investor Relations Department at Konfrut has been established in accordance with Article 11 (Investor Relations Department) of the CMB's Corporate Governance Communiqué No. II-17.1. The Department ensures the coordination of two-way communication between the Company's senior management and investors to maintain an effective relationship between the Company and investors. In this context, the main duties of the Konfrut Investor Relations Department are as follows:

- Conducting relations with existing and potential shareholders, capital market experts, and analysts, and effectively answering questions from these parties; carrying out work to provide the necessary information to ensure the Company's capital market instruments traded in financial markets reach their fair value; preparing and ensuring the publication of reports such as the activity report, corporate governance and sustainability principles compliance report, and investor presentations in accordance with legislation and regulations.
- Ensuring the Investor Relations section on the corporate website is kept up to date.
- Preparing documents required for shareholder information and review regarding the general assembly meeting, and taking measures to ensure the general assembly meeting is held in accordance with relevant legislation, the articles of association, and other internal regulations.
- Overseeing and monitoring the fulfillment of obligations arising from Capital Markets Legislation, including all matters related to corporate governance and public disclosure.

The Konfrut Investor Relations Department manages communication with shareholders and other stakeholders to ensure the distribution of information in an easily accessible, understandable, analyzable, timely, complete, and accurate manner, and avoids asymmetric distribution of information during its duties.

5. POLICIES REGARDING DISCLOSURE OF MATERIAL EVENTS

5.1. DISCLOSURE OF INSIDE INFORMATION AND RESPONSIBILITY

In all matters within the scope of Capital Markets Legislation and pursuant to other relevant regulations, in the event of information, events, and developments not yet disclosed to the public that may affect the value or price of Konfrut's capital market instruments or investors' investment decisions, the Company immediately makes an announcement via the PDP, except in cases where public disclosure is deferred. Material event disclosures at Konfrut are prepared by the Investor Relations department under the supervision of the Company General Manager and the Financial Affairs Director. Material event disclosures are arranged to be timely, accurate, understandable, sufficient, and free from misleading statements, based on the CMB's Material Events Communiqué No. II-15.1 and Guidelines, to assist beneficiary persons and institutions in decision-making. The Company's Financial Affairs Director is authorized and responsible for fulfilling the material event disclosure obligation. Material event disclosures are signed by the Investor Relations Manager and Executive established under the Financial Affairs Directorate and published on the PDP. Konfrut's material event disclosures can also be accessed from the Material Event Disclosures section on the website www.konfrut.com.tr. Information disclosed to the public cannot contain information likely to hinder Konfrut's competitiveness and cause harm to shareholders and other stakeholders, except for legal obligations. Information qualifying as trade secrets is not disclosed.

5.2. LIST OF PERSONS WITH MANAGERIAL RESPONSIBILITY AND THOSE WITH ACCESS TO INSIDE INFORMATION

Persons with managerial responsibility are those who have regular access to Konfrut and its subsidiary's inside information, directly or indirectly, and have the authority to make administrative decisions affecting the Company's future development and commercial goals. The list of those with access to inside information is kept electronically by the Central Registry Agency (CRA) to be transmitted to the CMB and the relevant Exchange upon request, pursuant to Article 7 of the CMB's Material Events Communiqué No. II-15.1. This list is created by the Company on the CRA's electronic portal MKS program, and changes are processed into the list within two days to ensure the list is kept constantly up to date. Persons on the list are informed in writing and/or electronically by the Company regarding the protection of inside information and compliance with confidentiality rules during their duties.

5.3. DEFERRAL OF PUBLIC DISCLOSURE OF INSIDE INFORMATION

To protect Konfrut's legitimate interests and prevent misleading investors, the public disclosure of inside information may be deferred based on the written approval of the Company's Board of

Directors or one of the Company's Senior Executives authorized by the Board of Directors, within the framework of Article 6 of the CMB's Material Events Communiqué No. II-15.1. In such a case, all necessary measures are taken to ensure the confidentiality of the inside information whose disclosure is deferred. Furthermore, persons possessing the information subject to deferral are informed about the obligations in the regulations and the sanctions to be applied in case of violation of these obligations. As soon as the reasons for deferring the public disclosure of inside information disappear, a public disclosure is made in accordance with the legislation. The deferral decision is mentioned in the disclosure to be made.

5.4. MEASURES REGARDING ENSURING THE CONFIDENTIALITY OF INSIDE INFORMATION

Pursuant to Capital Markets Legislation, all kinds of measures are taken by the Company to ensure the confidentiality of inside information. In this context, Konfrut and its subsidiaries' employees and other parties communicated with are informed in writing or using electronic media that they are obliged to protect the confidentiality of the information they possess during the process of the material event occurring and from the formation to the disclosure of the inside information, to ensure they are aware of the sanctions related to the misuse or dissemination of this information.

5.5. NEWS AND RUMORS

Konfrut has adopted the principle of primarily not expressing any opinion regarding market rumors and speculations. However, in the event of news or rumors about the Company that are important enough to affect the value or price of capital market instruments or investors' investment decisions, appearing in press-media organs or other communication channels for the first time or differing in content from previously disclosed information; the issue of whether these are true or sufficient is evaluated by the Company management under the coordination of the Investor Relations Department. In the evaluation regarding whether a material event disclosure will be made within the scope of this verification obligation, the circulation or awareness of the press-media organ where the news was published is taken into consideration. If it is deemed necessary to make a disclosure, a disclosure is made within the framework of the CMB's Material Events Communiqué No. II-15.1. If the news or rumors in question relate to information whose public disclosure has been deferred within the scope of the Material Events Communiqué, public disclosure is made by accepting that the reasons for the deferral have disappeared. Comments, analyses, evaluations, and estimates made based on publicly disclosed information about Konfrut are outside this scope. Independent of the material event disclosure, if deemed appropriate by the

Corporate Communications Department, a press release or press and public briefing may be made via the Company's corporate social media accounts.

5.6. DISCLOSURE OF FORWARD-LOOKING EVALUATIONS

Konfrut may disclose its forward-looking evaluations to the public within the framework of the principles specified in capital markets legislation. Forward-looking evaluations may be disclosed depending on a Board of Directors resolution or the written approval of a person authorized by the Board of Directors. It can be disclosed on the PDP in the format of a material event disclosure or presentation. Disclosures can be made a maximum of four times a year. However, in case of a significant change, the number limit may be exceeded. It is presented to the knowledge of interested parties that forward-looking evaluations shared with the public are made according to certain assumptions and may differ from actual results. In case of changes regarding forward-looking evaluations or if it is understood that the evaluations will not be realized, the public is informed without delay via the same tools.

5.7. SILENT PERIOD

To prevent asymmetric information distribution regarding the financial situation not yet disclosed to the public and unauthorized disclosures, Konfrut implements a practice it calls "silent period" at certain times of the year. This period is the time elapsed from the day following the end of the accounting period for which the financial statements and reports and independent audit reports prepared by the Company are prepared, until the public announcement of the said tables and reports in accordance with the legislation. During the silent period, Konfrut's financial situation is not discussed in meetings held with capital market participants. Questions regarding the Company's financial situation, excluding publicly disclosed financial information, are not answered.

5. PUBLIC DISCLOSURE OF FINANCIAL STATEMENTS

Konfrut's financial statements and footnotes are prepared on a consolidated basis in accordance with Turkish Accounting Standards/Turkish Financial Reporting Standards (TMS/TFRS), and annual and semi-annual financial statements undergo independent audit. Prior to the public disclosure of financial statements and footnotes, they are primarily submitted to the Audit Committee for suitability within the framework of Capital Markets Legislation and passed through the approval of the Board of Directors. Following the signing of the statement of responsibility, the financial statements and footnotes, along with the independent audit report if applicable for the relevant period, and other relevant documents, are transmitted to the PDP and disclosed to the public pursuant to the Capital Markets Law and Borsa Istanbul regulations and published on

the company's website. Financial statements and footnotes for past periods can be accessed from the Company's corporate website www.konfrut.com.tr.

6. PUBLIC DISCLOSURE OF THE ANNUAL REPORT

The annual report (activity report), prepared with content in accordance with the Turkish Commercial Code and Capital Markets Legislation, is passed through the approval of the Board of Directors and disclosed to the public via the PDP within the publication period of the financial statements, following the financial statements and footnotes disclosed to the public. It is also made available for access on the corporate website www.konfrut.com.tr.

7. CORPORATE WEBSITE

The corporate website www.konfrut.com.tr is used effectively for public disclosure as stated in the CMB's Corporate Governance Principles. The corporate website includes an "Investor Relations" section containing information and documentation disclosed pursuant to Capital Markets Legislation. There is also access via the website to notifications and material event disclosures made pursuant to relevant legislation provisions. The Investor Relations Department is responsible for keeping the investor relations section within the corporate website up to date and developing it. Work towards developing the corporate website continues permanently.

9. DISCLOSURES REGARDING THE EXERCISE OF PARTNERSHIP RIGHTS

Within the framework of the Turkish Commercial Code and Capital Markets regulations and Konfrut's Articles of Association provisions, information and documents such as prospectuses, announcement texts, and information documents arranged within the scope of right usage processes such as general assembly, capital increase, merger, and division transactions are announced on the PDP within the period and presented to the shareholders' information. Relevant documents are announced on Konfrut's website on the same day, in addition to the places specified in the regulation, ensuring investors can easily access the said documentation.

10. APPROVAL AND EFFECTIVENESS

This Disclosure Policy was approved by the Company's Board of Directors decision dated 13.04.2023 and numbered 2023/5 and entered into force on the same day. With this Policy, the previously publicly disclosed Disclosure Policy is repealed.