Kale Jet Engines

KALE JET MOTORLARI SANAYI AS
DISCLOSURE POLICY

The “Disclosure Policy” of our Company **Kale Jet Motorları Sanayi Anonim Sirketi** is determined in line with the proposal of the Corporate Governance Committee and the decisions taken by the Board of Directors in accordance with the provisions of the Turkish Commercial Code, Capital Markets legislation and other relevant legislation and the provisions of the Company's articles of association and is disclosed to the public on the Company's corporate website within the framework of the provisions of the capital markets legislation.

I- Purpose and Scope

The purpose of the Disclosure Policy is complete and timely public disclosure by providing an active and transparent communication that is complete, fair, accurate, timely, understandable, accessible at low cost and under equal conditions to all stakeholders, including shareholders, investors, employees and customers in compliance with the provisions of capital markets legislation, corporate governance principles and the Company's articles of association.

However, the Company may refrain from disclosing to the public certain confidential information, the disclosure of which is legally or contractually inconvenient or which, if disclosed pursuant to these regulations, may harm the Company's legitimate interests and/or trade secrets, within the framework of the principles set forth in the legislation.

In addition, the Company may postpone the public disclosure of internal information in order to prevent damage to its legal rights and legitimate interests within the framework of the provisions of the Communiqué on Special Cases, provided that this does not lead to misleading the public and can ensure that this information is kept confidential. When the reasons for postponement of disclosure of inside information to the public are eliminated, the said internal information is disclosed to the public in accordance with the regulations of the Communiqué on Special Cases and by stating the reasons for the postponement decision.

The information to be disclosed to the public is made available to the public on the “Public Disclosure Platform” (www.kap.org.tr) and on the corporate website of the company in a timely, accurate, complete, understandable, interpretable and easily accessible manner at low cost, in order to help the persons and organizations that will benefit from the disclosure to make decisions.

In terms of public disclosure, the Company will take into consideration the obligation to ensure the confidentiality of issues related to national security in line with the nature of the sector in which it operates and in line with the requests and warnings of the institutions with which it has commercial relations.

II- Disclosure Methods and Media

Without prejudice to the provisions of the Turkish Commercial Code, Capital Markets Law and other relevant secondary regulations, the disclosure methods and media used by our Company within the framework of this Disclosure Policy are set out below.

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a. Material event disclosures announced via the Public Disclosure Platform ("KAP") (www.kap.org.tr)

Material event disclosures regarding continuous and internal information required to be announced within the framework of capital markets legislation are prepared under the coordination of the Investor Relations Department within the framework of the recommendations and opinions of the relevant units and disclosed to the public through the KAP.

Within the frame of the capital markets legislation, press organs, press conferences and/or press releases or other means of communication may also be utilized for public disclosure of matters subject to special cases. Disclosure in made the Public Disclosure Platform prior to or concurrent with these announcements and also published on the Company's Corporate website.

b. Periodically disclosed financial statements, independent audit reports, statements and annual and interim activity reports

The Company's annual and interim consolidated financial statements and related notes are prepared in accordance with Turkish Accounting Standards and Turkish Financial Reporting Standards within the framework of the provisions of the Turkish Commercial Code, Capital Markets Law and other secondary legislation and are independently audited and disclosed to the public in the periods stipulated by the legislation.

Before the financial statements and footnotes are disclosed to the public, they are submitted to the approval of the Board of Directors with the opinion of compliance received from the Audit Committee within the framework of Capital Markets legislation and after the declaration of responsibility is signed by the members of the Audit Committee, who are designated as responsible for financial reporting by the decision of the Board of Directors, and the General Manager and/or the Finance Manager, the financial statements, footnotes and independent audit report for the periods stipulated by the legislation are electronically transmitted to the KAP in accordance with the regulations of the capital markets legislation. Annual reports disclosed to the public are published on the corporate website of the Company under a separate heading no later than the next business day after the disclosure is made, and can be accessed retrospectively on the corporate website of the Company for a period of 5 years.

Necessary information that shareholders may need regarding financial statements and related footnotes is available on Company's corporate website and is regularly updated.

c. Company's corporate website (www.kalejetengines.com)

Important headings that can be monitored on the Company's website are as follows:
• Detailed information on corporate identity
• Our Mission and values
• Information on the members of the Board of Directors and senior management of the company
• Organisation and partnership structure of the company
• Articles of Association of the Company
• Trade registry information
• Annual and interim financial statements, independent audit report and annual reports

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• Press releases

• Material Event Disclosures
• Information on analysts evaluating the Company and analyst reports
• General Assembly meeting invitation, agenda, information document
• Minutes of the General Assembly meeting and list of attendees
• Sample of the Power of Attorney
• Corporate Governance practices and compliance report
• Policies
• Frequently asked questions
• Ethical Rules

d. Announcements and notifications made through the Turkish Trade Registry Gazette

The announcements required to be published in the Turkish Trade Registry Gazette in accordance with the Turkish Commercial Code and capital markets legislation are made within the period stipulated by the legislation. As per the Capital market legislation, the announcement of the general shareholders' meeting is made at least three weeks in advance, excluding the announcement and meeting days, through the website, in a way to reach the maximum number of shareholders.

Financial reports, including the Annual Report, dividend distribution proposal, information document prepared in relation to the agenda items of the General Assembly, other documents forming the basis for the agenda items, and the text and justification of the amendment to the articles of association, if any, are made available for review at the Company's headquarters and on the website, where shareholders can access them in the most convenient way, as of the date of the announcement made for the invitation to the General Assembly Meeting. The Company's General Assembly agenda items are stated clearly and in a manner that does not lead to different interpretations.

e. Disclosure meetings held with investors, analysts as face to face or through teleconference, presentations

In order to ensure that the Company's operational and financial performance, vision, strategies and targets are communicated to shareholders in the best possible manner, the Company's senior executives and the Investor Relations Department meet with analysts and investors from time to time to share information, and may participate in national and international conferences or meetings. These presentations, questions/answers and summary information may also be published on the Company's website in order to promote the Company in the best possible manner. All meeting requests from shareholders are responded to, and the opportunity to hold meetings is provided at the highest level possible. Following the announcement of financial statement results and material event disclosures, teleconferences may be organized, investor presentations may be made and disclosed to the public through the corporate website.

f. Communication tools such as telephone, electronic mail, fax, etc,

Information requests submitted to the Company by shareholders and investors are responded to by the Investor Relations Department by telephone, fax, mail, e-mail, in writing and verbally when necessary, in accordance with the legislation, within the framework of publicly disclosed information, accurately, completely and in compliance with the principle of equality.

III- Principles on the disclosure of evaluations aimed for the future

Assessments that include plans and forecasts that are internal information about the future or that give investors an idea about the issuer's future activities, financial position and performance are disclosed with a decision of the Board of Directors maximum four times a year following the public disclosure of the quarterly financial statements issued by the Board of Directors within the framework of the principles specified in the capital markets legislation.

Future-oriented assessments may include, but are not limited to, expected developments in the market, turnover and unit growth forecasts, profitability ratios, investment plans and new product projections, provided that confidentiality, the Company's interests and contractual and regulatory restrictions are observed.

Assessments aimed to the future can be also carried out within the frame of the principles in capital markets legislation, through the investor presentation published on KAP and the Company's corporate website and/or the quarterly annual report, as well as material event disclosures and by persons authorized by the Board of Directors, through press and media organs, press conferences and/or press releases, national and international conferences or meetings or other means of communication.

Future assessments are based on reasonable assumptions and estimates. Expectations cannot contain baseless, exaggerated predictions; they cannot be misleading.

In case of deviation due to unforeseen risks and developments, if there is a significant difference between the matters previously disclosed to the public and the realizations, or if the estimates and bases in the forward-looking information are not realized to a significant extent or it is understood that they will not be realized, a public disclosure is made by including the reasons for these differences.

IV- Follow-up on news and rumors about the Company in press-media organs or Websites and the principles of making statements concerning these,

The Company follow-up on news and rumors that appear in press-media organs and other communication channels through contracted domestic data distribution channels and also within its organization, and in case there are any news or rumors that are different from the information that is disclosed to the public for the first time or has been previously disclosed to the public; the Company evaluates the impacts thereof on the value, price of its shares or investment decisions of investors within the scope of the company's internal regulations and, when deemed necessary, public disclosure is made promptly on whether these are accurate or adequate or not, within the scope of the principles set forth in the capital markets legislation, even if a deferment decision has been made.

The Company may make a statement at its own will regarding news and rumors that appear in the press-media organs but do not lead to a special circumstance disclosure obligation. If the news is not important enough to be defined as internal information, no disclosure is made as a principle. In addition to this, the General Manager, in coordination with the Investor Relations Department,

evaluates whether it would be beneficial to make a disclosure about such news that does not require a material event disclosure in accordance with the Communiqué. Such statements may be in the form of written or verbal communication with the media or may be notified to the public through the Company website (**www.kalejetengines.com**).

As a principle, no comment is made on news that is clearly not originating from the Company, based on gossip, rumor and unfounded. However, if deemed necessary to protect the interests of the Company and its investors, explanations may be made for such unfounded news.

The Company does not have an obligation to make a public statement regarding the adequacy and accuracy of the comments, analyses, evaluations and predictions made as based on information disclosed to the public through press and media organs and other communication channels.

V- Persons Authorized to Make Public Disclosures

Disclosures made on behalf of the Company through written and visual media and data distribution channels require the approval of the Chairman of the Board of Directors or one of the Deputy Chairmen of the Board of Directors.

In particular, the Investor Relations Department communicates on behalf of the Company by acting in coordination with the relevant units, when necessary, depending on the content of the request, in order to promote the Company before existing and potential investors and institutions and financial institutions in Türkiye and abroad, to meet the information requests of analysts and research experts working in these institutions, and to respond to the questions submitted to them within the scope of investor relations.

It is essential that all disclosures to be made by authorized persons on behalf of the Company are subject to preliminary evaluation under the coordination of the Investor Relations Department and in cooperation with the relevant units of the Company.

VI- Postponement of Public Disclosure of Internal Information

As a result of the evaluation made within the framework of the public disclosure regulations of the Capital Markets Board, the information is considered to be internal information that may affect the value and price of the Company's capital market instruments or the investment decisions of investors, it may be deemed necessary to use the authority to postpone the public disclosure of the said internal information in order to prevent damage to the legitimate interests of the Company, without disregarding the interests of investors.

Public disclosure of internal information can be postponed by a resolution of the Board of Directors. In the postponement decision, the information postponed, the effect of the postponement on the protection of the legitimate interests of the Company, that the postponement does not pose a risk of misleading investors, and what measures have been taken to protect the confidentiality of this information during the postponement period.

If, despite the confidentiality measures taken, the internal information subject to the postponement is disclosed to the public by another real and/or legal person inland or abroad or by the fault of the persons who are obliged to keep the information confidential,

in the event of a public disclosure, the conditions for postponement are deemed to have disappeared and a public disclosure is made immediately.

During the postponement period, disclosures that contradict the postponed information shall be avoided and as soon as the reasons for postponement of the public disclosure of the internal information disappear, the Company shall make a disclosure on the KAP about the internal information in question, indicating the postponement decision and the underlying reasons.

In the event that the event subject to the deferred disclosure of inside information is not realized, no further disclosure is made.

In case there are news or rumors regarding information whose public disclosure has been postponed, whether confidentiality is ensured is evaluated by taking into account the circulation or awareness of the press and media outlet in which the news is published, f it is concluded that confidentiality can't be ensured, a special situation statement is made immediately. The decision to continue the postponement is the responsibility of the Board of Directors that made the postponement decision.

VII- Measures taken as aimed to ensure confidentiality until the public disclosure of special cases

a. Company Information / Inside Information

Internal information refers to information, events and developments regarding a concrete event that a rational investor may consider important when making an investment decision, that are not disclosed to the public, that may provide an advantage to the person using the information over other investors who are not aware of this information, and that may have an impact on the value, price or investment decisions of investors of a capital market instrument if disclosed to the public.

When changes in inside information and previously publicly disclosed issues related to this information emerge or are learned by the Company, it is mandatory to make a material disclosure within the framework of the Board's public disclosure regulations.

In order to maintain the balance between transparency and the protection of the Company's interests, it is important that all Company employees pay attention to the rules regarding the use of insider information. All necessary precautions are taken to prevent the use of insider information.

As a general principle, the Company and those working on behalf of the Company cannot share with third parties any information that has not yet been disclosed to the public and that may be considered as a special situation. Information learned during the course of employment, belonging to the Company, which the Company does not wish to be known by anyone other than Company officials, and which may be considered a trade secret, is considered Company Information, “Inside Information”. All employees protect Company information during and after their employment with the Company and don't use it directly or indirectly.

b. Procedure for Public Disclosure of Special Cases

Special situation disclosures regarding continuous and internal information that must be announced within the framework of the Capital Markets Board's Communiqué on Special Cases are prepared in accordance with the provisions of the said Communiqué, under the coordination of the Investor Relations Department, within the framework of the recommendations and opinions of the relevant units, and are announced to the public through the Public Disclosure Platform (KAP) after being signed by any two of the General Manager, Investor Relations Department Manager, Investor Relations Manager, Board Member or Accounting Manager.

Special situation disclosures are submitted to the Public Disclosure Platform electronically within the time periods prescribed by the legislation and are published on the Company's website under the investor relations heading, at the latest within the business day following the disclosure. Special situation disclosures are posted on the Company's website under the investor relations section for five years.

Other parties who are in close contact with Company employees who have internal information are informed in writing, against signature, of the sanctions related to the misuse or dissemination of this information, in a manner that ensures that they accept the obligations stipulated in the law and relevant legislation regarding inside information, that they are obliged to protect the confidentiality of this information during the process of the occurrence of the special situation and from the formation of the special situation until its disclosure on the Public Disclosure Platform.

The Company takes all necessary measures by confidentiality commitments and similar methods of nature that will prevent the access of employees, other than those included in the list of individual who have access to internal information, and third parties that provide services.

If it is determined that inside information has been unintentionally disclosed to third parties by these persons (“unauthorized disclosure”), and it is concluded that the confidentiality of the information cannot be ensured within the scope of capital market regulations, a special situation disclosure is made immediately.

The Company informs its managers and employees about the obligations stipulated in the law and relevant legislation regarding insider information and the sanctions regarding the misuse or dissemination of this information through in-service training and orientation training. In addition to this, these issues are also included in the Company's Ethical Principles.

The Company may defer the public disclosure of internal information in order to prevent damage to its legitimate interests, provided that this does not mislead investors and can ensure the confidentiality of such information. Under such circumstances, the Company takes all measures to maintain the confidentiality of internal information, as per the capital markets legislation.

If the disclosure of information is postponed, a list of persons who have the information in question is drawn up at the time of the postponement decision and the “List of Those with Access to Company Insider Information” is updated within this scope. Necessary efforts are made to inform both these persons and parties who have information other than these persons and reasonable measures are taken.

No Company employee can engage in any activity that would generate profits through the purchase or sale of Company shares based on inside information received due to his/her position.

c. Silent Period/Blackout Period

The period starting 15 (fifteen) days before the date on which the financial statements and reports prepared by the Company and the independent audit reports are announced to the public in accordance with the legislation and ending with the announcement of the relevant period results to the public is called the (“**Silent Period**”). Any comments on the Company's activities, financial performance or financial outlook, other than the information disclosed to the public by the Company officials on behalf of the Company, and the questions of any capital markets participants such as analysts or investors are nor replied during the Silent Period; however, this period does not prevent the Company officials from participating in conferences, panels and/or seminars.

Also, the Company executives and the spouses, children of these individuals or the people who live in the same house with them may not make any transactions in the Company shares or capital markets instruments based on these shares during the period from the day following the end of the fiscal term when the **6-monthly and annual** financial statement and reports by the Company and the independent audit reports are prepared up to the day when such tables and reports are disclosed to the public in compliance with the legislation (“**Forbidden Period**”). The executives of the Company's affiliated and controlled partnerships and individuals who hold internal information or continuous information due to holding shares in the Company's affiliated and controlled partnerships are also within the scope of this prohibition.

IX- Principles used to determine individuals who have administrative liability

Within the scope of the Capital Markets Legislation, "Individuals with Administrative Liability" have been defined as the members of the Company's board of directors, and individuals who regularly access the internal information of the Company directly or indirectly and are authorized to make administrative decisions that influence the future development and commercial objectives of the Company, although they are members of the board of directors. Accordingly, managers and other personnel who have detailed knowledge of only a part of the Company's business and whose knowledge of the whole is limited are not considered to be persons who have access to inside information.

Persons with Administrative Responsibilities in our Company are determined as members of the board of directors, committee members, the General Manager of the Company and department managers directly reporting to the General Manager and other persons included in the signature circular. The list prepared according to these criteria is shared with the Central Securities Depository in accordance with the provisions of capital market legislation.

In accordance with the provisions of the Communiqué on Special Cases, the Company shall inform the persons with administrative responsibility in writing so that all transactions carried out by persons with administrative responsibility within the partnership and persons closely associated with them regarding shares representing the capital and other capital market instruments based on these shares are reported to the relevant stock exchange by the person carrying out the transaction. In determining the persons with administrative responsibility and the persons closely associated with them, the definitions specified in the Communiqué on Special Cases are taken into account.

The Board of Directors is responsible for the implementation, development and monitoring of this Disclosure Policy.

All questions concerning the implementation principle and methods of this policy are required to be addressed to the Investor Relations Department.

This Disclosure Policy entered into force with the decision of the Board of Directors dated 29.12.2024 and no. 2024/55, and is also disclosed to the public on the Company's corporate website. Any changes to this Disclosure Policy are subject to the same procedure.