

ANATOLIA TANI VE BİYOTEKNOLOJİ ÜRÜNLERİ ARAŞTIRMA GELİŞTİRME SANAYİ VE TİCARET A.Ş.

DISCLOSURE POLICY

Anatolia Tanı ve Biyoteknoloji Ürünleri Araştırma Geliştirme Sanayi ve Ticaret Anonim Şirketi ("**Company**") disclosure policy ("**Policy**") has been issued in line with the Turkish Commercial Code Nr. 6102 ("**TCC**") and Capital Markets Law Nr. 6362 ("**CML**") and Capital Markets Board ("**CMB**") Material Events Communiqué (II-15.1) ("**Material Events Communiqué**"), Corporate Governance Communiqué (II-17.1) ("**Communiqué**") and its annexes ("**Corporate Governance Principles**").

1. Purpose and Scope

Company management maintains a transparent and close communication with its shareholders. The main objective is to increase the value of the Company for shareholders and potential investors.

The purpose of this Disclosure Policy is to ensure that information and developments related to the strategy and objectives of the Company, which may affect the investment decisions that do not carry the nature of trade secret, are presented to the stakeholders, especially the investors, in a fair, complete, accurate, timely and easily understandable manner, within the framework of the relevant legislation.

The company complies with the CMB, capital market legislation, TCC and Borsa İstanbul A.Ş. ("**BIST**") regulations and pays utmost attention to the implementation of the principles contained in the CMB's Corporate Governance Principles.

This Policy covers all employees and consultants of the Company and it regulates the written and verbal communication of the Company with the capital market participants.

This Policy has been issued in accordance with Article 17 of the CMB's Material Events Communiqué and announced to all stakeholders via the Company website (www.anatoliagenetworks.com).

2. Authority and Responsibility

This Policy has been established and approved by the Board of Directors within the framework of CMB Corporate Governance Principles. The Board of Directors reserves the right to make changes in this policy. Changes to this policy shall be published on the Company's website following the approval of the Board of Directors. Monitoring, supervision and development of the Company's public disclosure and disclosure policy is under the authority and responsibility of the Board of Directors. The head of the company's investor relations department is assigned to oversee and monitor all matters related to public disclosure.

3. Public Disclosure Methods and Tools

Disclosures are made through disclosure tools such as material disclosures, financial statements and reports, annual activity reports, website, presentations, investor meetings and teleconferences, informative articles, press releases, and Trade Registry Gazette. Without prejudice to the Capital Market Legislation and TCC provisions, the main public disclosure methods and tools used by the Company are as follows;

- Material disclosures communicated through the Public Disclosure Platform (“PDP”),
- Financial statements and footnotes, independent audit report, statements and statements periodically submitted to PDP.
activity report,
- Announcements and publications made through the Turkish Trade Registry Gazette and daily newspapers,
- Press statements made through written and visual media,
- Informative meetings and meetings with capital market participants face-to-face or via teleconference,
- Corporate website, (www.anatoliagenetworks.com) disclosures,
- Communication via telephone, mobile phone (wap and similar technologies), e-mail, telefax, etc. explanations on communication methods and tools.

4. Public Disclosure of Financial Statements

The Company's financial statements and footnotes are prepared on a consolidated basis and in accordance with Turkish Accounting Standards/Turkish Financial Reporting Standards (TMS/TFRS). Annual and semi-annual financial statements are disclosed to the public after being audited independently.

Before the financial statements and their footnotes are disclosed to the public, they are approved by the Board of Directors with the approval of the Audit Committee within the framework of the Capital Markets Legislation. After the declaration of accuracy is signed, the financial statements and footnotes, the independent audit report and the accompanying documents are disclosed to the public through the Public Disclosure Platform in line with the CMB and BIST regulations, following the approval of the board of directors, and published on the Company's website. Prior period financial statements and footnotes as well as information that shareholders may need are available on the Company's website.

5. Public Disclosure of Annual and Interim Activity Reports

Annual and interim activity reports are prepared in accordance with the Capital Markets Legislation and CMB Corporate Governance Principles and other regulations in effect in this context. Annual activity reports are approved by the Board of Directors and disclosed to the public, together with the financial statements, through the Public Disclosure Platform and published on the Company's website (www.anatoliagenetworks.com). The annual report is also printed as hard copy to be given to the relevant parties.

6. Public Disclosure of Internal Information and Authorized Persons

Material event disclosures regarding the Company's internal information are prepared by the Company's investor relations department, signed electronically and communicated to the Public Disclosure Platform.

Material event disclosures are arranged in a timely, accurate, understandable, sufficient and free manner from misleading statements, in order to assist the individuals and organizations that will benefit from the disclosure in their decision-making.

If any Company employee determines that important and private information that has not been disclosed to the public before, has been unintentionally disclosed to the public, he/she shall immediately notify the investor relations department. In this situation,

An appropriate material event disclosure is prepared by the investor relations department in line with the provisions of the Capital Markets Legislation and submitted to the Public Disclosure Platform.

The company announces material event disclosures in Turkish on its website (www.anatoliagenetworks.com) at the latest within the business day following the public disclosure, and keeps such disclosures on the website for a period of five years.

7. Persons Authorized to Make Public Disclosures

Apart from the above-mentioned notifications, written and verbal disclosure requests submitted by Capital Market Participants or any institution/person are evaluated by the investor relations department. In the evaluation; depending on the content of the request, it is taken into account whether it is a trade secret and whether it can affect investment decisions and the value of capital market instruments within the framework of the Material Events Communiqué. Written and verbal disclosure requests are generally answered by the investor relations department.

Press releases made to the printed and visual media can only be made by the members of the board of directors, the general manager, the assistant general manager responsible for the software business group, the assistant general managers responsible for the business and product development business group, the assistant general manager responsible for the business group for marketing, sales and corporate communications, and the financial and administrative work can be done by the director in charge of the work group.

Apart from this, Company employees cannot answer questions from capital market participants unless specifically assigned. Incoming information requests are directed to the investor relations department.

8. List of Persons with Administrative Responsibility and Access to Insider Information

Persons with administrative responsibility are those who, directly or indirectly, regularly access the Company's inside information and are authorized to make administrative decisions that affect the Company's future development and commercial goals. Therefore, persons who are not authorized to make administrative decisions, are not considered as persons who have administrative responsibility and who constantly access inside information.

In addition to the members of the Board of Directors, people who have regular access to information and are also authorized to make administrative decisions consist of assistant general managers.

All transactions carried out by persons with administrative responsibility and persons closely related to them, as well as the shares representing the capital and other capital market instruments based on these shares, are disclosed to the public by those who make the transaction within the framework of the principles written in the Communiqué on Material Events.

The list of those who have access to insider information is kept in writing to be forwarded to the CMB and/or BIST when requested in accordance with Article 7 of the Communiqué on Material Events. Everyone on the list is informed about the protection of inside information and compliance with confidentiality rules during their duties. This list is available at the Company and has been reported to the Merkezi Kayıt Kuruluşu A.Ş. When there is a change in these people, the necessary update is made within two working days at the latest.

9. Communication with Capital Market Participants

To the extent permitted by the Turkish capital market legislation, the Company may provide guidance on expectations regarding interim and annual operating results. Instead, the Company may convey to the capital market participants the critical issues affecting the results of its operations, its strategic approaches and important factors that enable a better understanding of the sector and the environment in which it operates.

Unless otherwise stated in the disclosure policy, only persons authorized to make public disclosures can establish communication with capital market participants on behalf of the Company.

10. Unfounded News Circulating in the Market

The news and rumors in the market in written, visual or audio media and/or the internet are monitored by ensuring being up-to-date with the market. In principle, the company does not express any opinion on market rumors and speculations. The Investor Relations Department monitors the news and rumors about the Company in the media and websites. This department evaluates whether these news and information will have an impact on capital market instruments.

If necessary, the Company also decides whether to make a material event disclosure within the framework of Article 9 of the Material Events Communiqué.

In cases where there is a decision to postpone a statement it has taken on the subject, the Company may refrain from making any statement until the reasons for postponement are removed.

On the other hand, a disclosure is made about the rumors and gossip in the market if a verification request is received from the CMB and/or BIST within the provisions of the capital market legislation, or if the management decides that it is necessary and more appropriate to give an answer.

11. Postponement of Public Disclosure of Insider Information

Persons on the list of those with access to insider information of the Company are informed about their obligations to keep confidential the inside information that has not yet been disclosed to the public, that they may have during the performance of their duties or the conduct of business and transactions on behalf of the Company, not to use them for the benefit of themselves and third parties, or not to disclose them to third parties without authorization.

In order not to harm its legitimate interests and not to mislead investors, the Company may postpone the disclosure of insider information to the public within the framework of Article 6 of the Material Events Communiqué, in this case informs the relevant persons about the postponement and takes measures to ensure confidentiality. The postponement process is carried out upon the written approval of the board of directors or senior executives generally authorized by the board of directors.

As soon as the reasons for postponing the public disclosure of inside information are eliminated, a public disclosure is made in accordance with the legislation. The decision to postpone and the reasons behind it are stated in the statement to be made.

12. Measures to Ensure Confidentiality of Insider Information Until Public Disclosure

As a general principle, 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 can be considered as a material event. If it is determined that insider information has been disclosed to third parties unintentionally by these persons, and if it is concluded that the confidentiality of the information cannot be ensured within the scope of capital market regulations, a material event disclosure is made immediately. In the event that the disclosure of information is postponed, the list of people who have the information subject to postponement is drawn up at the time of the postponement decision and the "List of Those Who Have Access to Insider Information" is updated in this context.

Reasonable measures are taken by carrying out necessary efforts to inform both these persons and the parties who have information other than these persons. Persons included in the list of those with access to inside information in question are informed by the investor relations department that they are on the list until the public disclosure of material events, financial and operational results, in order to protect inside information and to ensure that they comply with confidentiality rules. The Company signs confidentiality agreements with institutions that require insider information while performing their duties or use this information on behalf of the Company, from which it receives services such as consultancy and translation services, and puts these institutions under the obligation to keep such information confidential. The Company takes all kinds of measures to ensure the confidentiality of internal information in accordance with the relevant legislation.

13. Meetings and Interviews with Investors and Analysts

The company may organize informative meetings for analysts, investors, creditors and shareholders when deemed necessary. The meetings do not have a predetermined calendar year, and the frequency of the meetings is determined according to the needs. Various instruments such as roadshow, teleconference, e-mail, fax, analyst presentations, disclosure/announcement for direct information are used in order to increase the recognition and preferability of the Company in the field of international investment, to highlight its advantageous aspects compared to equivalent companies, and to make the Company preferable to other companies for investing institutions.

The Company considers analyst reports to be the property of the company that prepared the analyst report and does not publish them on the Company website (www.anatoliagenetworks.com). The company does not review, verify, approve, take responsibility for, or disseminate analyst reports or revenue models. On the other hand, in certain and limited circumstances and upon request, analysts may review their reports in order to prevent misinformation, provided that they use only public and historical information and are limited to a specific topic.

14. Public Disclosure of Future Evaluations

In accordance with its disclosure policy, the company may disclose its future expectations to the public from time to time. Evaluations for future may be made subject to the decision of the board of directors or the written approval of the person authorized by the board of directors. A maximum of four disclosures can be made per year. The material event can be disclosed in the disclosure format or in the presentation format at KAP. If there is a significant change in the evaluations for the future, this number limit can be exceeded and the necessary explanation is made. Evaluations for future can be made within the framework of the principles in the Capital Market Legislation, by making use of the media organs, press conferences, press releases, national and international conferences, meetings or other means of communication, as well as material disclosures.

It is submitted to the information of the relevant parties that the future evaluations shared with the public are made according to certain assumptions and may differ from the actual results. In the event that there are significant changes regarding the evaluations for future or it is understood that the evaluations will not be realized, the public is informed periodically by the same means without delay.

15. Silent Period

In order to prevent asymmetric information distribution and unauthorized disclosures about the financial statements, the Company refrains from discussing the operating results and financial status of the Company, which will be reported in the financial statements, with the capital market participants in certain periods of the calendar year. This period is called the "silent period". The silent period for the company starts from the day following the end of the quarterly, semi-annual and annual accounting periods and ends one business day after the financial statements and footnotes are disclosed to the public.

In addition, during the silent period (only for annual and semi-annual accounting periods), persons with inside information or permanent information, or their spouses, children or people living in the same household, are prohibited from trading in the Company's capital market instruments.

16. Market Abuse

In accordance with the relevant provisions of the CMB's Communiqué on Market Abuse (VI-104.1), the Board of Directors takes and implements necessary actions to ensure that persons included in the insider information access list shall not use confidential and/or trade secret and non-public information about the Company, which is within the scope of market abuse actions for generating any interest for themselves or others, that they do not provide false and misleading information about the Company, and that they do not spread news.

17. Company Website (www.anatoliagenetworks.com)

The Company website at www.anatoliagenetworks.com is actively used for public disclosure, as recommended by the CMB's Corporate Governance Principles. The disclosures made on the Company's website shall not supersede the notifications and material disclosures that must be made in accordance with the provisions of the capital market legislation. All disclosures made by the company to the public are accessible via the website. The website is structured and segmented accordingly. Every precaution is taken regarding the security of the website. The website is organized in the content and manner stipulated by the CMB Corporate Governance Principles. In particular, the announcement regarding the general assembly meetings to be held, the information document on the agenda items, other information, documents and reports on the agenda items, and information on the methods of participation in the general assembly are prominently featured on the website. Efforts to improve the website are continued continuously.