

## **1. Purpose**

The management of Kordsa Global Endüstriyel İplik ve Kord Bezi Sanayi ve Ticaret A.Ş. (Kordsa Global) is proud of being in a transparent and close communication with its shareholders. The main goal is to increase the value of Kordsa Global for the shareholders and to turn its shares into attractive investment instruments for the potential investors, as well.

To this end, the management of Kordsa Global accepts implementing the strategic plans and sharing its results fully, fairly, correctly, timely and transparently with the public, shareholders, investors and capital market specialists (jointly capital market participants) equally as a principle pursuant to financial reporting standards and provisions of Capital Market Legislation.

Kordsa Global complies with Capital Market Legislation, Turkish Commercial Code Legislation and Borsa Istanbul A.Ş. (BIST) regulations on public disclosure and gives utmost importance in accomplishing the principles on CMB Corporate Governance Principles.

Disclosure Policy involves all employees and consultants of Kordsa Global and regulates the written and verbal communication of Kordsa Global with the capital market participants.

Disclosure Policy of Kordsa Global was prepared in accordance with Article 17 of the "Communiqué Regarding the Public Disclosure of Material Events" with Serial No. II-15.1 of Capital Markets Board and is announced to all shareholders via the web site of Kordsa Global web Site ([www.kordsaglobal.com](http://www.kordsaglobal.com)).

## **2. Authority and Responsibility**

Disclosure Policy has been established and approved by the Board of Directors pursuant to CMB Corporate Governance Principles. Public disclosure and surveillance, supervision and development of disclosure policy in Kordsa Global are under the authority and responsibility of the Board of Directors.

Global Finance Management, which is responsible for Investor Relations and positioned under Vice Presidency - Finance and Sourcing, has been commissioned in order to supervise and to pursue all matters regarding the public disclosure.

## **3. Public Disclosure Methods and Instruments**

Disclosures are made through information instruments such as material disclosures, financial statements and reports, annual reports, the web page, presentations, investor meetings, teleconferences, information letters, press releases, Turkish Trade Registry Gazette etc. Basic public disclosure methods and instruments used by Kordsa Global have been stated in the following provided that provisions of Capital Market Legislation and Turkish Commercial Code (TCC) are reserved;

- Material disclosures transmitted through Public Disclosure Platform (PDP),
- Financial statement and footnotes, independent audit report, declarations and annual report transmitted periodically to Public Disclosure Platform (PDP),
- Announcements and proclamations performed through Turkish Trade Registry Gazette (letter of authorized signatures, general assembly call of notice etc.)
- Press releases performed through printed and graphic media,
- Disclosures made to data distribution institutions such as Reuters, Forex etc.,
- Briefings and meetings held with capital market participants, either face to face or through teleconferences,
- Notifications of Corporate web site ([www.kordsaglobal.com](http://www.kordsaglobal.com)),
- Disclosures made through communication methods and instruments such as telephone, mobile phone (wap and similar technologies), electronic mail, telefax etc.

#### **4. Public Disclosure of Financial Statements**

Financial statements and footnotes of Kordsa Global are prepared in accordance with Turkish Accounting Standards / Turkish Financial Reporting Standards (TAS / TFRS).

Annual and semi-annual financial statements are disclosed to the public after an independent audit.

Financial statements and footnotes are approved by the Board of Directors through assent of Audit Committee pursuant to provisions of Capital Market Legislation before any public disclosure. After accuracy statement is signed, financial statement and footnotes, independent audit report and attached documents are transmitted to PDP and then disclosed to the public in accordance with the CMB and BIST regulations following the approval of Board of Directors and then published on the Company's web site. Financial statements and footnotes of previous periods can be accessed through the Company's web site.

#### **5. Public Disclosure of Annual Report**

Annual report is prepared in accordance with Capital Market Legislation and CMB Corporate Governance Principles. It is approved by the Board of Directors and then, disclosed to the public along with the financial statements. It is published in the Company's web site ([www.kordsaglobal.com](http://www.kordsaglobal.com)).

Furthermore, a summarized annual report is prepared quarterly and it is published together with the financial statements in PDP and Company's web site. The annual report is also published as printed in order to be distributed to the relevant authorities as well.

#### **6. Public Disclosure of Material Events and Authorized Persons**

Material events disclosures of Kordsa Global are prepared by Global Finance Management positioned under Vice Presidency - Finance and Sourcing and principally signed electronically by CEO (Chief Executive Officer) and Vice President - Finance and Sourcing, via Exclusive Electronic Certificate (EEC) - Electronic Smart Card, then transmitted to PDP and disclosed to the public. If the actions mentioned are inapplicable, material events disclosures are electronically signed by Vice Presidents, Directors and Managers respectively, who obtain authority to sign and Exclusive Electronic Certificate (EEC) - Electronic Smart Card, then transmitted to PDP and disclosed to the public.

Material disclosures are issued timely, correctly, transparently, sufficiently and free from misleading statements in order to assist decisions of persons and institutions who/which shall benefit from the disclosure.

An information is considered as an important and private information, if there is a high chance for a reasonable investor to find this information important and private.

If any employee of Kordsa Global realizes that any important and private information, which has not been disclosed to the public in advance, is disclosed to the public inadvertently, s/he informs to Global Finance Management immediately about the situation. In this case, appropriate material disclosure is prepared and then submitted to PDP by Global Finance Management in accordance with the provisions of Capital Market Legislation.

Kordsa Global announces material disclosures at the web site ([www.kordsaglobal.com](http://www.kordsaglobal.com)) at least within the business day following the public disclosure and keeps such disclosures available in the web site for five years period.

#### **7. People Authorized to Make Public Disclosures**

Written and verbal information requests performed by Capital Market Participants or any institution/person other than above mentioned are assessed by Global Finance Management. Upon the assessment, it is considered whether the request is in the nature of a trade secret or not, according to its content and whether it can affect investment decisions and the value of capital market instruments

pursuant to the "Communiqué Regarding the Public Disclosure of Material Events" with Serial No. II-15.1 of Capital Markets Board. Written and verbal information requests are answered by the related unit, after the assessment of Global Finance Management.

Press releases made to written and visual media and data distribution channels such as Reuters, Forex etc. can be made only by CEO (Chief Executive Officer) or any Kordsa Global personnel approved and appointed by CEO, when/if required.

Apart from this, unless employees of Kordsa Global are specifically appointed, they cannot answer the questions addressed by the capital market participants. Incoming information requests are directed to Global Finance Management.

#### **8. List of People Having Managerial Responsibility and Accessing Insider Information**

People having managerial responsibility are the people who have regular access to direct or indirect insider information of Kordsa Global and who have the capacity to make administrative decisions to affect the future growth and commercial objectives of Kordsa Global. Therefore, people who are not authorized to make administrative decisions are not considered as persons who have managerial responsibility and ongoing accesses to the insider information.

Besides the Board Members, persons with the capacity to have ongoing access to the information and the power to give managerial decisions are CEO (Chief Executive Officer) and Vice Presidents.

The list of people who have access to the insider information is preserved in a documented form at the Global Finance Management, ready for submission to CMB and/or BIST if requested as per Article 7 of the "Communiqué Regarding the Public Disclosure of Material Events" with Serial No. II-15.1 of Capital Markets Board. All listed persons are notified about protecting insider information and complying with the confidentiality rules during their duty terms. This list has been notified to Central Registry Agency (CRA). The notification is renewed when such people are changed.

#### **9. Communication with Capital Market Participants**

Kordsa Global does not make any guidance about expectations concerning interim period and annual results. Alternatively, Kordsa Global prefers to transmit critical issues affecting annual results, its strategic approaches, and important issues ensuring better understanding of the sector and operated environment to the capital market participants. Unless otherwise stated in the information policy, only people who are authorized to make public disclosure on behalf of Kordsa Global, may establish the communication with capital market participants.

#### **10. Incorrect News Circulating on the Market**

In principle, Kordsa Global does not present any opinion on market rumors and speculations. Kordsa Global follows news and rumors that appear in the media organs and web sites, and informs Global Finance Management. Global Finance Manager assesses whether such news and information shall have any influence on the capital instruments or not.

Global Finance Management decides on whether to make any material disclosure pursuant to Article 9 of the "Communiqué Regarding the Public Disclosure of Material Events" with Serial No. II-15.1 of Capital Markets Board.

On the other hand, when verification request comes from CMB and/or BIST within provisions of Capital Market Legislation or in the event that the management decides that it is required and more suitable to give any answer, the disclosure is made about rumors and gossips circulating on the market.

### **11. Postponement of the Public Disclosure of Insider Information**

People, who are listed for accessing insider information of Kordsa Global, are informed about obligations of keeping confidential the insider information which they may have during execution of their duties or conduct of works and transactions on behalf of the Company and have not been disclosed to the public yet, not using them by providing any interest for themselves and third parties or not disclosing them to third parties without any authority.

Kordsa Global may postpone the public disclosure of the insider information pursuant to Article 6 of the "Communiqué Regarding the Public Disclosure of Material Events" with Serial No. II-15.1 of Capital Markets Board in order that its legitimate interests are not damaged and it is not caused to mislead the investors. In this case, it informs the related persons about the postponement and takes measures ensuring confidentiality. Postponement procedure is realized pursuant to written approval of Board of Directors or CEO and Vice Presidents who have been authorized by Board of Directors.

As soon as postponement reasons of public disclosure of insider information are removed, public disclosure is made in accordance with the legislation. Postponement decision is stated on the disclosure to be made.

### **12. Meetings and Discussions Held with Investors and Analysts**

Global Finance Management positioned under Vice Presidency - Finance and Sourcing is responsible for conducting relationships with both its existing and potential shareholders, answering investor questions in the most efficient manner and increasing the corporate value regularly.

Global Finance Management positioned under Vice Presidency - Finance and Sourcing uses various instruments needed such as advertisement, teleconference, e-mail, fax, analyst presentations, directly informative disclosure/announcement, for increasing recognition and preference of Kordsa Global in the international investment field, featuring its advantageous aspects when it is compared with equivalent institutions and making Kordsa Global more preferable than other companies for the institutions making investment on emerging markets. Meeting requests from shareholders are answered duly and it is ensured to organize these meetings with the highest level as much as possible.

Kordsa Global acknowledge that the analyst reports are the properties of the company which prepares them and does not publish them in the Company's web site ([www.kordsaglobal.com](http://www.kordsaglobal.com)). Kordsa Global does not review, verify, approve analyst reports or income models and does not take their responsibilities and does not spread them. On the other hand, in some definite and limited cases and upon request, analyst reports may be reviewed, provided that only publicly disclosed and previous historical information is used and it is limited to a specific issue, in order to prevent incorrect information of the public.

### **13. Public Disclosure of Future Assessments**

Kordsa Global may disclose its future expectations publicly from time to time in accordance with the disclosure policy. Future assessments can be performed up to four times a year, regarding to the related Board of Directors resolution or the written approval of person who is authorized by the Board of Directors. It may be disclosed at PDP in the material disclosure format or presentation format. If there are important events, number limit may be exceeded. It is submitted for information of related parties that, future assessments disclosed publicly are made according to some presumptions and may vary from actual results. In the case that there are changes related to future assessments or it is understood that assessments shall not be realized, the public opinion is informed immediately with the same instruments.

### **14. Silent Period**

Kordsa Global refrains from discussing about financial results and other related issues in definite periods of the calendar year with capital market participants in order to prevent asymmetric

information distribution and unauthorized disclosures concerning annual results. This period is called as "silent period". The silent period for Kordsa Global starts from the day following quarter intervals, end of semi-annual and annual fiscal period and ends after a business day when financial statement and footnotes are disclosed publicly. During the silent period, Kordsa Global;

- Shall not discuss financial status of Kordsa Global other than publicly disclosed information on the meetings to be held one by one or in groups with capital market participants,
- Shall not inform any opinion about its activities and financial status unless it deems necessary and provided that provisions of Capital Market Legislation are reserved,
- Shall not answer questions directed one by one and by small groups other than information disclosed publicly in connection with financial results; and shall not make any statement to such types of groups. In case such situation occurs, the statements shall be available on its web site ([www.kordsaglobal.com](http://www.kordsaglobal.com)).

Furthermore, people who have insider information or ongoing information or spouses, children of such people or persons who live in the same home are forbidden to make transaction in the capital market instruments of the Company within the silent period.

### **15. Predatory Practices**

Board of Directors of Kordsa Global implements and applies required measures for people in the list of insider information not to use confidential information and/or information which is in the nature of trade secret and are not disclosed to the public about the Company under the scope of Predatory Practices so as to provide interest for themselves or others, not to provide incorrect, misleading information about the Company, not to publish news in this manner pursuant to related provisions of Capital Markets Board's Communiqué with Serial No. VI-104.1.

### **16. Web Site of Kordsa Global ([www.kordsaglobal.com](http://www.kordsaglobal.com))**

Web site of Kordsa Global at [www.kordsaglobal.com](http://www.kordsaglobal.com) is used actively for public disclosure as recommended by CMB Corporate Governance Principles. Disclosures in the web site of Kordsa Global does not replace notifications and material disclosures which should be made in accordance with provisions of Capital Market Legislation. It is ensured to access all public disclosures made by Kordsa Global via web site. Web site is configured and partitioned accordingly. All kinds of measures concerning security of the web site are taken. Web site is arranged in Turkish and in English within the content and in the manner stipulated by CMB Corporate Governance Principles. Especially announcement concerning the general assembly meetings to be held, agenda articles, informative documents about the agenda articles, other information, documents and reports related to agenda articles and information about methods of participating into the general assembly are stated remarkably in web site. The works concerning development of the web site are continuous.

Important headings, which may be followed in the web site, are summarized as follows:

- Detailed information concerning corporate identity
- Mission, vision, corporate values, ethical rules and main strategies
- Information about members of Board of Directors and Executive Board
- Production facilities and range of products
- Ethical values
- Company's organization and partnership structure
- Company's articles of association
- Trade registry details
- Financial information
- Annual reports
- Press releases

- Material disclosures
- Meeting date of General Assembly, agenda, statements about agenda articles
- General Assembly meeting minutes and list of participants
- Proxy samples
- Corporate Governance practices and compliance report
- Profit distribution policy
- Donation and Aid Policy
- Remuneration policy
- Disclosure policy
- Internal Directive
- Section of frequently asked questions

#### **17. Review**

This policy is to be reviewed by Global Finance Management reporting to Vice Presidency - Finance and Sourcing, once a year.

**23.03.2015**