

NORM Holding Disclosure Policy

1. Objective and Scope

- 1.1 The Disclosure Policy has been established in order to provide timely, accurate and complete information that does not constitute a trade secret to Norm Holding's partners, all stakeholders, employees and all stakeholders, including the public.
- 1.2 The Disclosure Policy covers all employees and stakeholders of Norm Holding, regulates written and verbal communication and is announced on the Norm Holding website www.normholding.com.

2. Authority and Responsibility

- 2.1 Norm Holding's Disclosure Policy is created and implemented under the authority of the Board of Directors. The Board of Directors reserves the right to make changes in this policy from time to time in accordance with the relevant regulations. The disclosure policy and the changes to be made in the policy are published on the company's website following the approval of the Board of Directors.
- 2.2 The Board of Directors is responsible for the implementation, development and monitoring of the Disclosure Policy.
- 2.3 Financial management and reporting supervisors and the Corporate Communications Department are responsible for observing and monitoring all matters related to public disclosure.
- 2.4 These officials fulfill their duties in close cooperation with the Corporate Governance Committee and the Board of Directors.

3. Persons Authorized to Make Disclosures

- 3.1 Except for forms, statements and reports signed in accordance with the signature circular, disclosures and notifications to be made on behalf of Norm Holding within the framework of the above-mentioned purpose and scope are made by

the Chairman of the Board of Directors, Members of the Board of Directors, CEO, Head of Industry Group, Head of Commercial Group, Sales Director, Financial Affairs Director and/or Corporate Communications Manager.

4. Disclosure tools

- 4.1 Special Circumstances Disclosures.
- 4.2 Financial statements and their footnotes, independent audit reports and annual reports.
- 4.3 Announcements made through the Turkish Trade Registry Gazette and daily newspapers.
- 4.4 Statements Regarding Norm Holding News and Rumors.
- 4.5 Informational meetings and presentations.
- 4.6 Norm Holding websites
- 4.7 Print and Digital Media channels.

5. Principles of Use of Disclosure Tools

5.1 Special Circumstances Disclosures

- 5.1.1 In case of significant events and developments, Norm Holding discloses its value, what it does in the field of business and what it does for the benefit of society and the country on its corporate website under the title of "Special Circumstances Disclosures". When necessary, special circumstances disclosures are published in print and digital media channels.
- 5.1.2 Norm Holding's special circumstance disclosures are prepared by the Executive Board and the Corporate Communications Department. It is approved by the Board of Directors in a digital environment via e-mail and disclosed to the public by the Corporate Communications Department on the website.
- 5.1.3 Special circumstance disclosures are prepared in a timely manner, in a way that is accurate, understandable, adequate and free from misleading statements.

5.2 Financial statements and their footnotes, independent audit reports and annual

reports.

5.2.1 Annual reports and financial statements prepared in accordance with the decision of Norm Holding's Board of Directors are presented to the public for review in required detail or on the corporate website with the prepared presentation reports.

5.3 Announcements made through the Turkish Trade Registry Gazette and daily newspapers.

5.3.1 General Assembly meeting agenda, General Assembly meeting minutes, signature circular, any amendments to the articles of association, including capital increase, and annual financial statements are disclosed to the public through the Turkish Trade Registry Gazette.

5.3.2 Announcements belonging to the company are made in accordance with the provisions of the article .. of the articles of association of the company and the first paragraph of article 414 of the Turkish Commercial Code, without prejudice to the provisions of the fourth paragraph of Article 35 of the Turkish Commercial Code.

5.4 Statements Regarding Norm Holding News and Rumors

5.4.1 News or rumors about Norm Holding in print, digital media or other communication channels are regularly followed up by the Corporate Communications Department, and notifications are made to the Board of Directors, Senior Management and related units.

5.4.2 In the presence of news and rumors that appear in printed and digital media channels, that could affect its reputation and values, that are not originating from persons authorized to represent the companies, and that have a different content than the information previously shared with the public; Norm Holding reserves the right not to make any comments regarding inside information that has been postponed as a principle, or questions from the media about issues that are not on the agenda, as well as rumors, rumors and news that are evidently unfounded.

5.4.3 However, in cases where there is a need for a material disclosure about whether this information is correct and sufficient, information is provided by persons to be determined by the Board of Directors. It is ensured that the statements made are delivered to the printed and digital media channels determined by the Executive Board in the form of written or verbal communication by the Corporate Communications Department and published on the websites.

5.5 Informational meetings and presentations.

5.5.1 Norm Holding Board of Directors may organize information and strategy meetings for its stakeholders when it deems necessary. The time, place and method of the meetings are determined by the Board of Directors. The presentations and reports announced at the meetings can be presented to the stakeholders through the Corporate Communications Department and included on the corporate website with the details and content deemed necessary by the Board of Directors within the framework of equality in access to information.

5.6 Norm Holding Internet Siteleri

5.6.1 Norm Holding website which has been arranged in accordance with the Corporate Governance Principles;

<https://www.normholding.com.tr/>

5.6.2 Websites of the Norm Holding group companies;

<https://normholding.com.tr/>

<https://www.normcivata.com.tr/>

<https://www.normsomun.com/>

<https://www.msvida.com.tr/>

<https://www.normcivata.com.tr/>

<https://www.uysalkaplama.com/>

<https://www.nedukalip.com/>

<https://www.nrmguhendislik.com.tr/>

<https://www.normgmbh.de/>

<https://www.standartcivata.com.tr/>

<https://www.bestkalecivata.com/>

<https://www.normbursa.com/>

<https://www.normfsp.com/>

<https://www.sttrading.com.pl/>

<https://www.vissarteurope.com/en-construction/>

<https://www.normfasteners.co/>

<https://www.mubiko.com/>

5.6.3 The development and continuous updating of the website are carried out by the Corporate Communications Department under the supervision of the Corporate Governance Committee. In addition, Norm Holding documents, cards and letterheads include www.normholding.com, and the internet address of the relevant Norm Holding company.

5.6.4 The content of the website is as follows:

5.6.4.1 About Us

(History, Board of Directors, Organization Chart, Ethical Principles and Compliance Policy, Corporate Governance Statement, HR policy, Innovation)

5.6.4.2 Activity Fields

(Sectors, Our Companies, Annual Report, CSR)

5.6.4.3 Life at Norm

(Being at Norm, Norm Career, Norm Academy)

5.6.4.4 Sustainability

(Our Sustainability Approach, Reports)

5.6.4.5 Media Center

(Press Releases, News, Our News, Special Circumstances, Guides, Images & Videos)

5.7 Print and Digital Media channels

5.7.1 Norm Holding announces what it does in the field of business and what it does for the benefit of society and the country, important events and developments through the Corporate Communications Department following the approval of the Executive Board, in accordance with the principles set in the Norm Holding Social Media policy, in printed and digital media channels.

6. Persons with Administrative Responsibility

- 6.1 Norm Holding Board of Directors and Executive Board members are defined as those who, although they are not members of these boards, have direct or indirect access to the internal information of the companies and have the authority to make administrative decisions that affect the future development and commercial goals of the companies.
- 6.2 All transactions to be carried out by Norm Holding administrative responsibilities and persons closely related to them are defined in the Internal Directive of the Board of Directors.

7. Protection of the Confidentiality of Insider Information

7.1 The list of those who have regular access to insider information is prepared annually by the Norm Holding Corporate Governance Committee and this list is updated on a monthly basis in case of changes. The list of those who have access to inside information and the updates made in the list are announced on the corporate website and internal communication channels in accordance with the principles in the Internal Communications policy, according to the request and decision of the Board of Directors.

8. Enforcement and Implementation

8.1 The Disclosure Policy and any subsequent amendments come into effect with the decision of the Board of Directors.

8.2 Changes to be made after the Disclosure Policy are submitted for the information of the Executive Board and announced to the public through the Corporate Communications Department on the corporate website, in print and digital media channels.

8.3 The Board of Directors is responsible for the enforcement of this regulation.