


Initial Issue: 28/04/2009 Second Issue: 21/03/2012 Third Issue: 08/12/2014	IS INVESTMENT TRUST	 INVESTMENT TRUST
INFORMATION POLICY		Page 1 / 3

General Framework

Is Yatirim Ortakligi A.S. shall carry out and fulfill any and all kinds of disclosure of financial details and also such other disclosure and information, which are required to be submitted within the framework of the Capital Market Regulations, Turkish Commercial Code and such other relevant regulations, by complying with and adhering to the generally accepted accounting principles and the corporate governance principles as well.

The primary purpose of the information policy is to ensure that the required information other than any business/trade secrets are disclosed to and shared with the shareholders, investors, employees and the other related parties on equal grounds in a timely, accurate, full, understandable and readily manner so as to be accessible at the lowest costs.

Is Yatirim Ortakligi, which has been exhibiting an active attitude in relation to the adoption and implementation of the Corporate Governance Principles, has been making its best efforts in order to accomplish and materialize the requirements of the relevant regulations, and the international best corporate governance practices in relation to public disclosure and information. The information policy of Is Yatirim Ortakligi A.S. has been drawn up and prepared in accordance with the abovementioned framework, and has been approved by the Board of Directors of the company, and has been promulgated as of the same date.


Authority and Responsibility

The information policy has been established by the Board of Directors. The power and the responsibility for monitoring, supervision and improvement of the public disclosure and the information policy shall be enjoyed and assumed by the Board of Directors. The General Manager of the Company, and the Executive in Charge of Investor Relations have been appointed to carry out the coordination in respect of the information process. The said officials shall perform and fulfill their responsibilities in close cooperation with the Corporate Governance Committee and the Board of Directors.

Endeavors For Public Disclosure, and the Methods Utilized For Such Purposes

Some of the endeavors carried out for the purposes of public disclosure and information in accordance with the capital market regulations, Turkish Commercial Code and the relevant regulations, and also the means and methods utilized for such purposes are given below;

- The material disclosures, which are required to be submitted in relation to any progresses and developments that are considered to have any impact on the investment decisions of the investors, and the value of our traded capital market instruments, within the framework of the capital market regulations, shall be announced to the public timely and accurately through the **Public Disclosure Platform (KAP)**, and also shall be published on the website of the Company.
- The financial statements, which are drawn up and prepared within quarters in accordance with the capital market regulations, shall be announced and disclosed to the public through the Public Disclosure Platform (KAP) within the statutorily prescribed periods, and shall also be published on the website of the Company. However, in case of submission of any financial statements to any Authority as per the regulations, at any date prior to the periods for reporting the financial statements and the disclosure of the financial statement by the Company, as determined by the Capital Markets Board of Turkey; it is required that such financial statements are disclosed through the KAP (Public Disclosure Platform) on the date of submission of such financial statements to the relevant Authority, at the latest.


Initial Issue: 28/04/2009 Second Issue: 21/03/2012 Third Issue: 08/12/2014	IS INVESTMENT TRUST	
INFORMATION POLICY		Page 2 / 3

- The annual reports and the interim reports, issued by the Board of Directors, shall be announced and disclosed to the public through the Public Disclosure Platform (KAP), so as to cover the minimum information and details prescribed under the relevant regulations, along with the financial statements, and shall be published on the website of the Company.
- Announcements and notices in respect of the matters such as the amendments to the articles of association, the shareholders' general assembly meetings and the capital increase shall be conducted in accordance with the provisions prescribed under the regulations as well as the articles of association.
- The annual reports, balance sheets, income statements, profit distribution proposals and the audit reports shall be submitted to the examination of the shareholders at the Principal Office of the Company within the periods prescribed under the regulations, prior to the shareholders' ordinary general assembly meeting each year, and shall also be published on the website of the Company.
- The material disclosures and the reporting, which are required to be announced in accordance with the Capital Market regulations, shall be announced to the public through the Public Disclosure Platform (KAP) within the statutorily prescribed periods, and shall also be announced on the website of the Company.
- If it is deemed to be required, press releases may be announced through the printed or visual media. Such releases may be announced and performed by the Chairman of the Board of Directors, the members of the same, the General Manager of the Company or such other authorized person who will be deemed to be appropriate by the Board of Directors. The relevant disclosures shall be announced and published on the website of the Company.
- If it is deemed to be required, some meetings with the investors may be held either at home or abroad; and the presentations pertaining to such meetings shall be announced and published on the website of the Company in order to be disclosed to and be shared with the public.
- Any questions, raised and forwarded by the shareholders and the related parties by any means of communication such as e-mail, telephone or letter, shall be replied within the shortest period by the executives in charge of Investor Relations.
- It shall be ensured that the website of the Company is kept and maintained up-to-date in respect of information and such other matters.

Website of Is Yatirim Ortakligi A.S. (www.isyatort.com.tr)

The corporate website of the Company shall be actively and keenly utilized for the announcement of the information, and for the disclosures to the public as well. The website, drawn up both in Turkish and English, shall include the information and data prescribed by the Corporate Governance Principles and the regulatory authorities, as well as any information to elucidate the investors. Utmost attention shall be paid for keeping and maintaining the website up-to-date on continuous basis.

The website of the Company has been allocated so as to include the "Information Society Services" as part of the applicable regulations. The portal of the Central Registry Agency is connected via the said section, and the documents set out under the regulations can be accessed accordingly.

Initial Issue: 28/04/2009 Second Issue: 21/03/2012 Third Issue: 08/12/2014	IS INVESTMENT TRUST	
INFORMATION POLICY		Page 3 / 3

Considerations for Future

The persons, empowered to disclose any considerations for future of the Company to the public, are the Members of the Board of Directors and also the General Manager. Any such considerations may be disclosed to the public only upon the approval, in writing, of the authorized persons. Disclosure of any such considerations to the public may be performed either as material disclosures, or through the annual reports, drawn up as per the regulations, or by means of the investor informative presentations, provided that the same shall be disclosed on the Public Disclosure Platform (KAP).

In respect of any disclosure to be made in respect of any considerations for future; in case of any significant/material differences between the matters disclosed already to the public, and the actuals, then the reasons of such difference shall be mentioned, and the explanations shall be submitted in accordance with the regulations of the Capital Markets Board in respect of such matter.

Other Matters

The news published on the media organs in relation to the Company shall be monitored and traced. In case of determination of any news about the Company, which may have any impact on the investment decisions of the investors, or on the value of the stock/equity of the Company, and the contents of which are different than the information which have been previously announced to the public, the material disclosure in relation thereto shall be announced through the Public Disclosure Platform (KAP). The disclosure in relation to the news, which have been published on the media organs, but which do not impose any obligation for material disclosure, shall be announced through the Public Disclosure Platform (KAP) if and when deemed required by the Company.

Administrative Accountability

Due to the fact that they may constantly access any internal information, either directly or indirectly, during the course of performance of their functions to serve as the executive management staff, and also due to the fact that they serve as the executives vested with the powers to resolve for any administrative matters that may have any impact on the progress of the Company in future and the business targets of the same; the Members of the Board of Directors as well as the executives our Company shall be regarded as the "Persons With Administrative Accountabilities".

Non-Disclosure

Our Company shall pay the utmost attention for the maintenance and protection of the confidentiality of the information, which have not been disclosed to the public, and/or which are of business secret nature. The issues in relation to non-disclosure have been addressed within the internal regulations, setting the conditions of employment, and also within the "Code of Ethics of the Company" available within the annual reports.

Furthermore, the issues in relation to mutual confidentiality shall be incorporated into the agreements to be executed by and between the Company and the third persons for the performance and fulfillment of some business of the Company. In addition to the above mentioned practices, the persons listed within the "List of Persons Who May Access to Internal Information" prepared in accordance with the relevant regulations, shall be provided with the information in relation to the obligations in relation to the fact that the internal information should be kept and treated as confidential and that such information may not be used during the trading of the capital market instruments of Is Yatirim Ortakligi, and such persons shall be notified to the system of the Central Registry Agency.