

KAFEİN YAZILIM HİZMETLERİ TİCARET A.Ş.

INFORMATION POLICY

1. PURPOSE

The Information Policy of Kafein Yazılım Hizmetleri Ticaret A.Ş. (Kafein) is prepared in order to present to the public in an accurate, timely, complete, comprehensible, understandable, equitable and easily accessible manner the information that is not covered by the scope of trade secrets, in a way to assist shareholders and stakeholders in making decisions Kafein's actual past performance, future plans and expectations, strategy and target developments, shareholders, by considering the balance between Kafein's transparency and the protection of its interests.

In case of any change within the scope of the Information Policy, which will be announced through the Company's website, it will be submitted to the public through the same channel.

2. SCOPE

The Information Disclosure Policy covers which developments and information will be disclosed to the public, how often and through which channels, in addition to the information specified by the legislation.

3. AUTHORITY AND RESPONSIBILITY

Public disclosure within the Company and the monitoring, supervision and development of the Information Policy are under the authority and responsibility of the Company's Board of Directors.

Disclosure of issues other than the information specified by the legislation:

Members of the Board of Directors are authorized to inform the public about strategies, plans and expectations, evaluation of past performance, sharing of goals and vision and other issues.

4. PUBLIC DISCLOSURE PRINCIPLES AND MEANS

The information policy is realized through the following means.

- Material event disclosures and other notifications announced through the Public Disclosure Platform (www.kap.org.tr) ("KAP"),
- Financial statements and related footnotes, independent audit reports, annual reports and statements of responsibility periodically disclosed through KAP,
- Corporate website (<http://www.kafein.com.tr>),
- Announcements and notices made through the Trade Registry Gazette and daily newspapers,
- Press releases, press releases and announcements made through written and visual media,
- Communication means such as electronic mail etc,
- Telephone, Fax etc.

5. SPECIAL CIRCUMSTANCES DISCLOSURE

The information to be disclosed to the public in accordance with the Communiqué on Special Circumstances No. II-15.1 prepared within the scope of compliance with the regulations in the Capital Markets Law No. 6362 (Law) is made on the KAP by using the relevant form on the KAP. Unless otherwise stated in the Communiqué on Special Circumstances numbered II-15.1, it is essential to make the disclosures immediately. In the statement to be made, it is declared that the disclosure is in compliance with the principles set forth in the Communiqué, that it fully reflects the information received by the issuer in this regard, that the information is in compliance with the books, records and documents of the issuer, that all necessary efforts have been made to obtain complete and accurate information on the subject and that the issuer is responsible for these disclosures.

Disclosures of special circumstances are available on our Company's website and at www.kap.org.tr.

All measures to ensure the confidentiality of special circumstances until they are disclosed to the public are taken by the Board of Directors and the Investor Relations Unit.

6. WEBSITE

The Company uses its website, which contains the information and data required by corporate governance principles and regulatory authorities, for disclosure and public disclosure.

The website contains information on general introduction, contact information, shareholding structure, trade registry information, articles of association, special circumstances disclosure, sample power of attorney, information on board members, periodical financial statements and annual reports, corporate governance principles compliance report, dividend distribution policy, information policy of Kafein Yazılım Hizmetleri Ticaret A.Ş. Utmost care is taken to keep the website constantly updated.

7. PUBLIC DISCLOSURE OF FINANCIAL STATEMENTS

Kafein's annual and interim financial statements and related footnotes are prepared in accordance with Turkish Accounting Standards and Turkish Financial Reporting Standards determined in accordance with the Turkish Commercial Code, Capital Markets Law and the regulations put into effect within this scope and disclosed to the public via KAP within the periods specified in the Capital Markets Board regulations and following the approval of the Board of Directors in accordance with the procedure specified therein.

Publicly disclosed financial statements and related footnotes are published under a separate heading on the Kafein investor relations website no later than the business day following the disclosure. The said financial statements and footnotes shall be available on Kafein's website for five years. The necessary information that shareholders may need regarding the financial statements and related footnotes are available on Kafein's website and updated regularly. All applications and questions made by shareholders are answered by phone or e-mail without any discrimination.

8. PUBLIC DISCLOSURE OF THE ANNUAL REPORT

Kafein's annual and interim activity reports are prepared in accordance with the Turkish Commercial Code, Capital Markets Law Capital Markets Board Corporate Governance Principles and other regulations put into effect within this scope and disclosed to the public through KAP following the approval of the Board of Directors in line with the periods and procedures specified in the relevant regulations.

Annual reports disclosed to the public are published under a separate heading on the Kafein's website no later than the business day following the disclosure. These annual reports are available on the Kafein's website for five years.

9. ANNOUNCEMENTS FROM TURKISH TRADE REGISTRY GAZETTE

The Agenda of the General Assembly Meeting, Proxy Forms, General Assembly Meeting Resolutions and any amendments to the Articles of Association including Capital Increase are announced to the public through the Trade Registry Gazette.

10. NEWS AND RUMORS IN THE MEDIA AND SIMILAR COMMUNICATION CHANNELS

News and rumors in the market in written, visual or audio media organs and/or on the internet are followed up by keeping up to date with the market. In principle, Kafein does not express any opinion on unfounded news, market rumors and speculations not originating from Kafein.

In case of existence of news and rumors about Kafein, which may affect the investment decisions of investors or the price of capital market instruments and which are not originated by persons authorized to represent Kafein, a

special circumstances disclosure is made within the framework of capital markets legislation regarding their accuracy and/or adequacy. However, Kafein may refrain from making any disclosure in cases where there is a decision to postpone the disclosure until the reasons for the postponement are eliminated.

In the event that the news or rumor in question is not material enough to be defined as inside information, the persons authorized to make public disclosures on behalf of Kafein do not express any opinion unless it is deemed necessary to make a statement on the subject.

11. DISCLOSURE OF EXPECTATIONS AND TARGETS

Kafein may disclose its future expectations from time to time within the framework of its Information Policy. In the written documents in which Kafein discloses its expectations for the future, it is clearly stated that possible risks, uncertainties and other factors may significantly differentiate actual results from expectations.

Forward-looking statements may be made only by persons authorized to make public disclosures and only by expressly stating the foregoing caveats or by referring to an existing and publicly available written document.

Future expectations in the disclosures shall be based on reasonable assumptions and estimates and shall be disclosed together with the reasons and data on which the estimates are based. Expectations may not contain baseless, exaggerated predictions; may not be misleading and shall be associated with Kafein's financial status and results of operations.

In the event that the expectations for the future and their bases are not realized or it is understood that they will not be realized, this situation is immediately disclosed to the public within the framework of the procedures specified in the Information Policy and the information in question is revised.

This Information Policy has entered into force with the decision of the Board of Directors dated **28.05.2018** and numbered **2018/20**. In case any amendment is required in the Information Policy, the amendments become valid after the approval of the Board of Directors and are disclosed to the public on the Kafein's website. In addition, investors are informed about the amendment at the first General Assembly meeting to be held.