

LOGO YAZILIM SANAYİ VE TİCARET A.Ş.

DISCLOSURE POLICY

1. Purpose, Authority and Responsibility

Logo Yazılım Sanayi ve Ticaret A.Ş. (Logo, Company) Disclosure Policy shall be prepared within the framework of the relevant regulations of the Turkish Commercial Code and the Capital Markets Board,. It shall comply with the CMB Corporate Governance Principles to share information with shareholders in a complete, fair, accurate, timely, understandable, and cost- effective manner.

The Board of Directors prepared the Logo Disclosure Policy based on the recommendations of the Investor Relations Unit. The Board of Directors is ultimately responsible for monitoring, reviewing and improving the Disclosure Policy in line with the suggestions of the Investor Relations Unit. Reporting to the CFO, the Investor Relations Unit is in charge of the implementation of this Disclosure Policy.

2. Methods and Tools

The methods and tools of public disclosure by Logo are listed below, without prejudice to the Capital Markets Law and the Turkish Commercial Code (TCC):

- Disclosure of Material Events, submitted to the Public Disclosure Platform
- Financial statements and explanatory notes, submitted regularly to public disclosure
- Announcements and disclosures released on the Turkish Trade Registry Gazette and daily newspapers, including prospectuses, circulars, and invitations to the general assembly
- Press releases distributed via printed and visual media
- Declarations to data vendors
- Meetings, face-to-face interviews, and teleconferences with capital market participants

- Corporate website: www.logo.com.tr
- Communication media, including telephone, e-mail, and fax

3. Public Disclosure of Material Events

Public Disclosure of Insider Information

Public disclosures of insider information are submitted in accordance with the CMB Communiqué on Principles of Public Disclosure of Material Events.

Material event disclosures shall be submitted to the Public Disclosure Platform in line with the relevant laws, published on the corporate website on the following business day at the latest, and made available for at least five years.

Information to be announced publicly shall not be disclosed to a certain investor group or party before announcement at the Public Disclosure Platform.

Announcements on the Exercise of the Shareholder Rights

Public disclosure shall be submitted when the following issues become final with a Board resolution. Such information shall also be posted on the website:

- Date, time, venue, and agenda of the general assembly meeting, procedures for attendance and proxy voting
- Resolutions regarding the agenda items or off-the-agenda-items, announcement in case the General Assembly was not able to convene
- Announcements regarding dividend distribution, issues of new shares, allocation of capital increases, exercise of preemption rights, and cancellation of a share increase.

Measures to Ensure the Confidentiality of Insider Information before Public Disclosure

Employees of the Company are informed of their obligation to keep confidential any insider information to which they may have access while performing their tasks. The Employees shall not use non-public information to benefit personally or to provide benefit to third parties, and shall not disclose information to unauthorized third parties. The list of the persons who have regular access to inside information based

on their employment relationship or other means of relationship with the Company shall be compiled and updated by the Investor Relations Unit, in line with the Capital Markets Law. The insider list is submitted to Central Securities Depository (MKK) and any changes in this list are updated in accordance with the periods and conditions stated in the relevant regulations. Upon receiving such update notifications, insider list shall be kept by the Central Securities Depository (MKK) and submitted to the Capital Markets Board and the relevant stock exchange upon request. The persons who have been included on the insider list shall be informed about their obligations to protect insider information and follow confidentiality principles.

Disclosure of internal information to lawyers, independent auditors, tax advisers, credit agencies, and financial service providers who are subject to the rules of confidentiality is not identified as unauthorized disclosure provided that such information is required by those persons to perform their tasks. The persons who have access to insider information shall be bound by confidentiality pursuant to a legal arrangement, articles of association, or a special agreement.

Persons Authorized to Submit Disclosure of Material Events

Material disclosures of the Company are prepared by the Investor Relations Unit, which is also responsible for overseeing and monitor any issues relating to public disclosure.

Material disclosures are submitted by persons who also have the authority to represent and bind the Company.

4. Public Disclosure of Financial Statements

Annual and interim financial statements and explanatory notes shall be prepared in line with the financial reporting standards issued by the Capital Markets Board. The financial and legal affairs department submits financial statements to the Board of Directors for approval, together with its evaluations—upon receiving the opinions of the external auditor and the responsible managers—as to reliability, accuracy, and compliance with accounting standards.

Independently audited financial statements and the independent audit report shall be disclosed to the public with a Board of Directors resolution, concerning their disclosure to public, on the same day of receipt from the auditor, attached to a letter signed by a person with the authority to represent and bind the independent audit firm in accordance with Capital Markets

Board regulations. The unaudited financial statements shall be disclosed to public before the close of business the day following the date of the Board of Directors resolution approving the financial reports in accordance with Capital Markets regulations. The annual and interim financial statements and reports shall be announced together with the statement of responsibility for their accuracy, which is signed by the general manager and the department head responsible for preparation of the financial statements. In line with the regulations of the Capital Markets Board, financial statements shall also be submitted to the Public Disclosure Platform.

Annual and interim financial statements and reports shall be published on the corporate website following the date of public disclosure and shall be made available for at least five years. The Investor Relations Unit is also required to provide these documents upon request.

Annual financial statements and reports shall be made available for review at the headquarters of the Company and on the corporate website 3 weeks before the General Assembly Meeting and shall be delivered via mail upon request.

Financial statements prepared as per other regulations shall be disclosed to public on the day of submission to the relevant authority.

5. Disclosure to Stakeholders

Immediately after the public disclosure, annual and interim financial statements and reports of the Company shall be published on the Investor Relations section of the corporate website with "Audit Reports" and "Annual Reports" labels.

The Company may organize one or two meetings or teleconferences with senior management, in which all stakeholders may participate, in the days following the announcement of the financial reports. Detailed information regarding the meetings and teleconferences and relevant presentation material shall be announced on the corporate website within a reasonable time period before such meetings. . The Investor Relations Unit shall send the details of meetings and teleconferences in advance via e-mail to anyone who has requested them. Depending on the requests received from investors and analysts, senior

management and the investor relations team may participate in various domestic or international investor/analyst meetings and conferences. In addition to this, one-on-one meetings shall be organized with investors and analysts upon request.

6. Proceedings Regarding Media Reports and Rumors

News reports about the Company shall be monitored on a daily basis. If news items or rumors in print or online media, which did not originate from the Company, deviate from the information disclosed by the Company via announcements of material events, prospectus, circulars, other announcements approved by the Capital Markets Board, financial reports, or other public disclosure documents, and such news items or rumors would have a potential effect on the share price, the Company shall make an additional public announcement for clarification before the Capital Markets Board requests such a disclosure.

If news reports are in line with the announcements or documents listed above, or if the management does not believe that the news or rumors would have a significant impact on the share price, the Company shall not make any additional public announcement.

In accordance with the CMB Communiqué on Principles Governing Public Disclosure of Material Events in some circumstances that do not require public disclosure, the Company may decide to make an announcement through authorized staff via media or the corporate website or issue a disclosure of material event in order to refute, correct, or clarify misleading news or rumors.

Should the Capital Markets Board require clarification about a certain event, the Company shall make an immediate announcement of material event.

7. Persons with Managerial Responsibility

In line with the relevant regulations, persons with managerial responsibility in the Company are

- the members of the Board;

- the CEO and other members of the Executive Committee, who have the authority to make managerial decisions that would affect the Company's future and business goals; and
- people who have direct or indirect regular access to insider information.

Accordingly, people who have no regular access to insider information or people who do have such access but do not have the authority to make managerial decisions that would affect the Company's future or business goals are not classified as persons with managerial responsibility. Persons who have managerial responsibility and persons defined as their related parties in line with the regulations are fully responsible for notifying the public of share transactions they make.

8. Company Officials Authorized to Make Public Announcements

Requests for any information or reports on the operations or financial results of the Company shall be handled by the Investor Relations Unit via telephone, e-mail, or at face-to-face meetings, provided that such requests are related to publicly available information and do not involve trade secrets.

Interview requests received from media outlets shall be fielded by the Marketing and Communications Department of the Company, which then would coordinate the relevant Company officials. The Marketing and Communications Department is also responsible for coordinating news conferences and press releases.

In case insider information is revealed unintentionally in the context of the foregoing disclosures, the Company shall immediately make an announcement of material events in line with the relevant regulations.

Other than the disclosures outlined above, the Company's staff is not allowed to answer questions received from the capital market participants or any person/institution. Contact information of the Marketing and Communications Department and the Investor Relations Unit are available on the Company's website.

9. Forward-Looking Statements

Company management may make forward-looking statements from time to time in line with this policy. A forward-looking statement made in the Company's written documents shall be accompanied by a disclaimer stating that actual results may differ materially from the expectations expressed in the forward-looking statements due to various risks, uncertainties, and other factors. The investment community shall be informed about this fact.

10. Website

The website of the Company (www.logo.com.tr) is actively used for public disclosure. The Investor Relations section of the Company website shall contain the following information:

- Trade Registry Information
- Shareholding Structure
- Board of Directors
- Announcements
- Annual and Interim Reports and Financial Statements
- Invitation to the General Assembly, Agenda, Informative Documents, and Meeting Minutes
- Proxy
- Articles of Association
- Disclosure Policy
- Dividend Distribution Policy and Proposal
- Code of Ethics
- Corporate Governance Principles Compliance Report
- Investor Relations Calendar
- Frequently Asked Questions
- Other information that might be useful for stakeholders

11. Effective Date

This Disclosure Policy was approved at the Board meeting of 15 March 2017, and put into effect immediately. The Disclosure Policy will be submitted for shareholders' information in the next general assembly meeting.