

OTOKAR OTOMOTİV VE SAVUNMA SANAYİ A.Ş. INFORMATION POLICY

I – PURPOSE

In order to inform the public efficiently, transparently and on an ongoing basis, Otokar pursues an information policy by which the information is provided accurately, completely and understandably on a timely manner. Otokar aims at creating an efficient and open communication platform by uniformly sharing its vision and objective target, past performance and expectations with the public, the relevant authorized entities, the existing and potential investors and the shareholders and by announcing its Financial information to the public in accordance with the generally accepted accounting principles and the provisions of the Capital Market Law in a correct, fare timely and detailed manner, with the exception of trade secrets.

In all its practices relevant with the public disclosure, Otokar complies with the regulations Capital Market Boards and of the BIST and seeks to implement the most efficient communication policy

II - RESPONSIBLE PERSONS

The Board of Directors is responsible for the establishment, supervision and updating as necessary of the Information Policy. At the same time, the Shareholder Relations Unit reporting to the Assistant General Manager in charge of Financial Affairs is responsible for the implementation and following up of the Information Policy and provide report about implementation results and amendment suggestion when required. The Information Policy adopted by the Board of Directors is submitted to the information of the shareholders at the general meeting and announced to the public at Public Disclosure Platforma and at the web site (www.otokar.com.tr). In case of any amendment in the information policy, the new certified policy announced to the public at Public Disclosure Platform and at the web site (www.otokar.com.tr)

III - METHOD AND MEANS OF INFORMATION

Method and Means

In the establishment of the public disclosure and information policy, Otokar uses the following method and means in accordance with the Regulations of the Capital Market Board and the BIST and the provisions of the Turkish Commercial Code:

- Special situation disclosures and general information of company announced at Public Disclosure Platform.
- Financial tables and activity reports announced at Public Disclosure Platform.- Annual and interim activity reports
- Corporate web site (www.otokar.com.tr)
- Information and promotion documents prepared for investors
- Meetings with investors
- Memoranda, circulars, notices and other documents required to be issued pursuant to the Capital Market Regulations
- Press releases made through the press and mass media
- Public announcements and notices made through the Turkish Trade Register Gazette and daily newspapers

Persons Authorized to Make Disclosures

Disclosures and information to be made on behalf of Otokar A.Ş. by using the methods and means stated above are handled by the General Manager and the Assistant General Manager in charge of Financial Affairs, except for the forms, declarations and reports signed as per the circular of authorized signatories.

In addition, the Investor Relations Unit reporting to the Assistant General Manager in charge of Financial Affairs is allowed to communicate on behalf of Otokar A.Ş. on matters like promotion of Otokar A.Ş. to existing and potential investors and intermediaries at home and abroad, fulfilling information requests of analysts and research specialists working at such institutions, answering of questions received by them regarding the investor relations.

Apart from the foregoing, unless specifically authorized, no employee of Otokar is authorized to give answer to questions received from any person or entity. Received information requests are directed to the Investor Relations Unit reporting to the Assistant General Manager in charge of Financial Affairs.

IV - SPECIAL SITUATION DISCLOSURE

Responsibility

Special situation disclosures to be made to public regarding important events and developments that may affect the value of the capital market instruments and the investment decisions of the investors shall be made in accordance with the regulations of the Capital Market Board.

Special situation disclosures are prepared by the Investor Relations Unit reporting to the Assistant General Manager in charge of Financial Affairs within the knowledge of the General Manager and forwarded by electronic signature to the Public Disclosure Platform. They are also announced to the public at the web site of the company and maintained at the web site for minimum 5 years.

List of Persons with Administrative Responsibility

The list of persons with administrative responsibility of Otokar A.Ş. includes the members of the Board of Directors and the auditors and the persons who are capable of regularly accessing the internal information directly or indirectly related with Otokar and who are authorized to take administrative decisions which may affect the future development and commercial targets of Otokar AŞ.

The persons who are capable of regularly accessing the information and authorized to take administrative decisions are the member of the board of directors of the main shareholder of the Company and at the same time are, the General Manager and the Assistant General Managers. Information about the persons who are in charge of the administration of the company, is announced at the web site (www.otokar.com) of the company.

Monitoring Mechanism

News stories appearing in the press about Otokar are monitored by the Corporate Communication Unit. News stories are shared with the General Manager, the Assistant General Managers, the Shareholder Relations Unit and the units concerned with the subject matter.

In addition, daily developments about Otokar in the subscribed data broadcasting channels of Reuters, Forex and Matrix are monitored.

Fulfillment of the Validation Obligation

Any news or rumors appearing in the press and the media about Otokar, not sourced by persons authorized to represent Otokar, which may affect the investment decisions of the investors or the prices of the capital market instruments, a statement is made as to accuracy or adequacy of the same.

Below principles are being applied in order to perform verification obligation by Otokar A.Ş.:

- a. Unless news are under the definition of internal information, no announcement will be provided about the issue. On the other hand the requirement of performing announcement about such issue will be decided by Deputy of the Financial Affairs Directorate and Corporate Communication Unit in accordance with the Capital Markets Board.
- b. No action will be provided if any announcement is performed with other public disclosure tools within the content of Capital Markets Board or material disclosure for the news as internal information.
- c. No comment is provided for the news which are rumour, story and idle as principle. But if protecting the rights and interests of Investors and Otokar A.Ş. is required material disclosure may be announced for such issues. Apart from the material disclosure, in case of requirement by the assessment of the Deputy Manager of Financial Affairs, press release shall be performed by the Corporate Communication unit.
- d. Material disclosure shall be performed if a news effect the value of Otokar A.Ş. shares and decisions of the investors which can be thought as internal information.
- e. In case of postponed information has important content, outsourced by Company and true, postponed reasons are accepted as disappeared and announcement is performed.
- f. If the news about the postponed information is incorrect, no announcement may be performed because information leakage is not possible. But if it is required in order to protect the interests of the Otokar A.Ş. and investors, material disclosure may be performed for baseless news.
- g. Awareness and circulation of media organ is considered for the released news in the assessment.

Measures Taken for Ensuring Confidentiality of Internal Information Units its Disclosure to Public

Employees of Otokar A.Ş. who have access to internal information and other parties communicated are informed about the fact that they are obliged to protect the confidentiality of such information in the course of occurrence of a special situation and during the time from the occurrence of such special situation till the disclosure of it.

As a general rule, Otokar A.Ş. and persons working for and on the name and account of Otokar A.Ş. may not share any information not yet in public domain, which can be considered as a special situation, with any third persons. If it is discovered that any internal information has been disclosed to third persons by such persons inadvertently and it is concluded that confidentiality of such information can no longer be ensured as required by the Capital Market regulations, a special situation disclosure is made.

In the event of postponement of disclosure of such information, the persons who have such information are informed about obligations in amendments and sanctions about the mentioned obligations. Required measures is taken in order to hide the internal information within the content of postponement.

V - STATEMENTS TO THE PRESS AND THE MEDIA

Through controlled feed of news by the Corporate Communication Unit of Otokar about important developments occurred during the year to the press, the mass media and the electronic media, the public is informed in detail. Information can be made through a press conference as well, depending on the content of the information. Questions and information requests of the media about the company and various developments are received and answered in writing.

All written statements shared with the press and the mass media are forwarded to data broadcasting corporations like Reuters and Forex. The representatives of such corporations are invited to all press conferences when the subject of such conferences is relevant.

Statements made through press-mass media are published at our web site in Turkish and English as well.

In case of announcements required Material Disclosure or containing important information which is not shared with the public yet, Material Disclosure is performed by Deputy Manager of Financial Affairs within the knowledge of General Manager in content of the provision Part IV simultaneously .

VI - INVESTOR MEETINGS

In order to communicate the activities and Financial performance as well as the vision, strategy and targets of Otokar to the shareholders in a best manner, the top executives and the responsible persons of the Investor Relations Unit of Otokar meet with intermediary firms, analysts and investors and presentations, question/answer sheets and summary information aimed at promoting Otokar in a best manner are prepared during the year. All requests received from shareholders for convening of a meeting are answered affirmatively. Through regularly updated web site and electronic media, it is ensured that shareholders and analysts are enabled to monitor the developments concerning Otokar closely.

Presentations made to investors, intermediary firms and concerned persons as well as periodic newsletters with financial content are disclosed through electronic media and web site. Statements and presentations are forwarded to requesting investors and shareholders in CD or hardcopy by mail.

There is a form for electronic newsletter at the web site to enable communication in electronic medium. In this way, easy access by investors who desire to obtain information about Otokar to such information and continuity of relations is assured.

All questions and information requests of investors about the company are answered by communication means like phone, fax, electronic mail, etc.

While the analyst reports written about the company are not published at our web site, the firms and communication data of the analysts are published at our web site.

VII - FINANCIAL STATEMENTS

Financial statements of Otokar are prepared in accordance with the provisions established by the Capital Market Board/Financial Reporting Standards. Annual tables are subject to full scope audit semiannual tables are subject to limited independent audit and disclosed to the public.

Before disclosed to the public, the financial statements and footnotes as well as the Activity Reports are submitted in accompany of the opinion of compliance obtained from the Audit Committee to the Board of Directors pursuant to the Capital Market Legislation. After the statement of obligation has been signed, the financial statements, the footnotes and the independent audit report, if any, are announced at the KAP system. Current and previous financial statements and footnotes issued in are available at Otokar A.Ş. web site.

VIII - ACTIVITY REPORT

Content of the annual activity reports is prepared at the office of the Assistant General Manager in charge of Financial Affairs in accordance with the international standards, the Capital Market Legislation and the Corporate Governance Principles. Once adopted by the Board of Directors, the report is disclosed to the public in Turkish and English at our web site. In addition, printed copies and copies in CD format are available at the Corporate Communication and Financial Affairs Units.

In addition, interim activity reports issued quarterly are disclosed to the public through the KAP system and submitted to the investors at our web site.

IX - WEB SITE OF THE COMPANY

In the Investor Relations pages in Turkish and English on the web site of the company at the address of www.otokar.com.tr, detailed information and current and past data pertaining to Otokar are provided pursuant to the Corporate Governance Principles. Content of the web site is prepared so as to contain diverse information which all stakeholders can make use of. This section is in the nature of a platform where information needed by investors, shareholders and analysts for valuation of the company and monitoring of the performance of the company and the stock is provided in detail and comprehensively and updated continuously.

Besides the corporate governance compliance report, memorandum and general meeting information and other information like the Articles of Association of the company, the web site of the company contains information required by the Capital Market Board from Special Situation Disclosures sent to the KAP to our activity

reports, periodic financial reports and capital structure data of the company. In addition, investor presentations and newsletters are published at our web site to inform the investors about important developments. In order to perform requested claims of our investors information is provided to our investors by presenting the production and sales data of Automotive Industry Association, export amount of trimester, annual capacity and capacity use rates, investments and employment information.

X - STATEMENTS ABOUT THE FUTURE

Investors are warned about statements contained in the written documents of Otokar, which have been made based on certain prospective assumptions. It is stated that such statements may be different from the expected results due to risks, uncertainties and other factors and are subject to revision accordingly.

XI - STATEMENTS ABOUT THE USE OF SHAREHOLDING RIGHTS

Shareholders are informed about the general meetings, capital rises, dividend payments, merger and division transactions through memoranda and notices at KAP to the Capital Market regulations. The said documents are published at the web site of Otokar A.Ş. besides the media set out in the regulation, so as to facilitate the access by the investors to such documents.