

BİM BİRLEŞİK MAĞAZALAR A.Ş.

DISCLOSURE POLICY

The objective of the information policy of BİM (the Company) is to inform the beneficiaries in compliance with the regulations of the Turkish Commercial Code, Capital Markets Board and Istanbul Stock Market.

For this purpose, any and all developments that can lead to important changes in the financial situation and/or activities of the Company, and information about other issues as required by the Legislation of the Capital Markets Board are immediately announced to the public. While disclosing information about itself to all shareholders and other beneficiaries, BİM pays strict attention to the principles of equality, accuracy, fairness, consistency, completeness, accessibility and proper timing, and also to protect the rights and benefits of the Company. No public disclosure includes any information that can affect the competitive power of the Company with consequences harmful to the shareholders and beneficiaries; business secrets of the Company are not disclosed.

The Company follows up the news and rumors as appeared in the media or internet environment through the contracted media follow-up company. The Company, as a matter of principle, provides no opinion about any speculation which appears in the market and/or on internet. However, if it is concluded that such news and rumors can influence the Company's share values and decisions of investors, the material disclosure is made by the relevant member of the Executive Board and CFO.

BİM announces its financial results quarterly. The administration organizes at regular intervals analyst and investor meeting and/or teleconferences in order to provide information and answer questions about the operational results. The presentations prepared for investors in teleconferences are published on the Company website (www.bim.com.tr). The administration also attends national and international investor conferences, and holds one-to-one meetings in order to share information with investors and analysts. For any case requiring disclosure of a phenomenon unknown by the public, the relevant member of the Executive Board, CFO and Investor Relations Manager assess the issue within the framework of the information policy of the Company and act accordingly.

The Company administration is responsible for confidentiality of the information in question until it is disclosed to the public. In this respect, those employees who have the knowledge of the phenomenon may not share this information with third parties until the material disclosure is made. In the event it is found that internal information has been disclosed to third parties, the corresponding material disclosure shall be made immediately if it is concluded that confidentiality of the information cannot be preserved under the regulations of the Capital Market.

The Company Management can also hold meetings with media representatives from time to time to share public information and answer questions. Copies of all up-to-date statements published in the print media and material disclosures made in KAP are made

available on the Company website (www.bim.com.tr). Information requests of the media are admitted by the Public Relations Consultants of the Company, and evaluated in the Company in accordance with the information policy to provide responses. The spokesmen of the Company for all channels of information, including the media, are the members of the Executive Board.

When determining the persons with administrative responsibilities within the scope of the Capital Markets Board's Communiqué Serial II No:15.1 on Special Cases, the Company considers the members of the Board of Directors and directors who have direct or indirect access to internal information and who are authorized to make administrative decisions which affect future development and business objectives of the Company. In this respect, the members of the Board of Directors, members of the Executive Board, member of the Operation Committee and Purchasing Manager of the Company are included in the list.

In case of any disclosure of information concerning the future, assumptions and actualizations in the past forming the basis for such assumptions are announced together. If it is realized that predictions for the future are not valid to a great extent, the relevant information shall be revised.

The information policy of the Company and all amendments of this policy are subject to approval by the Board of Directors, submitted for the General Assembly's information and announced to the public in line with the regulations of the Capital Markets Board. The information policy was discussed and approved in the Board Meeting held on March 27, 2014, and took effect immediately after the approval.