

PEGASUS HAVA TAŞIMACILIĞI A.Ş. INFORMATION POLICY

Pegasus Airlines Information Policy is adopted in accordance with the provisions of the Material Events Communiqué No. II-15.1 and the Corporate Governance Communiqué No. II-17.1 of the Capital Markets Board and aims to determine the principles and procedures regarding the communication of information to Pegasus Airlines shareholders, investors and other stakeholders.

1. GENERAL PRINCIPLES

This Information Policy:

- a) Aims to establish a sustainable, efficient and transparent communication between Pegasus Airlines and its shareholders, investors and other stakeholders;
- b) Targets to have shareholders, investors and other stakeholders achieve correct and complete information on time, in equal terms and in a way that is comprehensible, interpretable and easily accessible at low cost;
- c) Does not trigger any disclosure obligation with respect to information that is deemed as commercial secret, that is legally objectionable or that may otherwise harm the legitimate interests of Pegasus Airlines.

In terms of communication of information, Pegasus Airlines complies with the Turkish Commercial Code, the Capital Markets Law and the applicable regulations including the Corporate Governance Principles of the CMB.

2. PUBLIC DISCLOSURE METHODS AND TOOLS

Save as otherwise required under the Turkish Commercial Code, the Capital Markets Law and the applicable regulations, the public disclosure methods and tools used by Pegasus Airlines are described below:

- a) Material event disclosures and other notifications publicly disclosed via the Public Disclosure Platform (www.kap.gov.tr) ("KAP") and Central Registry Agency Electronic General Assembly System ("E-GAS") for the publication of public disclosures.
- b) Activity reports and financial statements periodically disclosed through KAP as well as footnotes, independent auditor reports, responsibility statements and sustainability reports in relation therewith.
- c) Announcements made through the Turkish Trade Registry Gazette.
- d) Press statements, bulletins and announcements made through the written press, broadcast media or digital media.
- e) Statements made to data distribution firms.
- f) Physical or electronic informative meetings and events held with capital markets participants and informative presentation prepared for communicating with the relevant capital markets participants.
- g) Pegasus Airlines Investor Relations Website (www.pegasusyatirimciiliskileri.com) and Public Information Services Website (www.flypgs.com/bilgi-toplumu-hizmetleri).
- h) Communication via telephone, e-mail, and similar communication methods.
- i) Documents other than those listed above that need to be published in accordance with the applicable law.

3. DISCLOSURE OF MATERIAL EVENTS

A. Procedures Relating to Disclosure of Material Events

Continuous and inside information that need to be publicly disclosed as per the requirements of the Communiqué are communicated to the public without delay via KAP by the joint approval of at least two Pegasus Airlines representatives authorized in this respect. Public disclosures are prepared under the coordination of Pegasus Airlines Investor Relations Department, Corporate Secretariat and by the participation of other relevant units.

All material disclosures can be accessed through the links under the relevant section in the Investor Relations Website.

B. Postponement of Disclosure of Inside Information

Pegasus Airlines may postpone the disclosure of inside information to prevent any harm to its legal rights and legitimate interests within the framework of the Communiqué, so long as such postponement does not mislead the public and the confidentiality of the relevant information is secured. Once the reasons for postponement cease to exist the relevant inside information is communicated to the public, together with the reasons for postponement, in accordance with the provisions of the Communiqué.

C. Measures to Protect the Confidentiality of Inside Information

As a general principle, neither Pegasus Airlines nor the Board of Directors and any of our employees can share information that can be deemed as inside information with third parties. All Pegasus employees are informed of this obligation in writing. In the event (i) it becomes known that information that may be deemed as inside information is shared with third parties without authorization and (ii) Pegasus Airlines is unable to maintain the confidentiality of such information a public disclosure in relation to the inside information will be made without delay.

Pegasus Airlines Investor Relations Department and Corporate Secretariat maintain and update an Insiders List covering the individuals who have regular access to inside information on Pegasus Airlines. Persons named in the Insiders List are informed by our Investor Relations Department and Corporate Secretariat in writing of their confidentiality obligations and the possible consequences of any unauthorized disclosure of inside information.

Pegasus Airlines further undertakes all measures necessary for the protection of the confidentiality of the information that is shared with third parties including independent auditors, financial advisors, lawyers, and other consultants who are engaged in connection with its operations.

D. Persons with Administrative Responsibility and their Related Parties

Pegasus Airlines notifies those with administrative responsibility in writing of their and their related parties' obligations with respect to the public disclosure of their transactions on the capital markets instruments issued by Pegasus Airlines within the framework of the Communiqué. The definitions in the Communiqué are used to determine the scope of those with administrative responsibility in Pegasus Airlines and their related parties.

4. PUBLICATION OF FINANCIAL STATEMENTS

Pegasus Airlines prepares its financial statements and footnotes relating thereto in accordance with the Turkish Accounting Standards and the Turkish Financial Reporting Standards as per the Turkish Commercial Code, the Capital Markets Law and the applicable regulations and publishes these statements on KAP following the approval of the Board of Directors within the applicable deadlines set out in the CMB regulations.

Financial statements published on KAP are included in our Investor Relations Website latest on the immediately following business day. All published financial statements are kept in our Investor

Relations Website for a five-year period following disclosure.

Information which the investors might require in relation to the financial statements and their footnotes are provided in our Investor Relations Website and are regularly updated. All applications by and questions from our shareholders are responded without discrimination through telephone, e-mail, or one-on-one meetings.

5. PUBLICATION OF ACTIVITY REPORTS

Pegasus Airlines prepares its activity reports in accordance with the Turkish Accounting Standards and the Turkish Financial Reporting Standards as per the Turkish Commercial Code, the Capital Markets Law and the applicable regulations and publishes these statements on KAP following the approval of the Board of Directors within the applicable deadlines set out in the CMB regulations.

Corporate Governance Compliance Statement, Corporate Governance Compliance Form (URF), Corporate Governance Information Form (KYBF) and Sustainability Report and updates to these, when applicable, are published with the Activity Report.

Activity Reports published on KAP are included in our Investor Relations Website latest on the immediately following business day. All published activity reports are kept in our Investor Relations Website for a five-year period following disclosure.

6. OTHER DISCLOSURES

A. Disclosures Required by Law

All notifications required by law, other than those mentioned above and including those relating to the exercise of shareholding rights whether to be announced in the Turkish Trade Registry Gazette or otherwise in print or electronically are made by our authorized signatories in accordance with the procedures set out in the applicable legislation.

With the aim of easing access to information for our shareholders, our Investor Relations Department ensures that notifications relating to the exercise of shareholding rights made elsewhere are promptly made available in our Investor Relations Website.

B. Information and Documents Relating to General Assembly Meetings

Information document prepared in connection with the General Assembly agenda and other necessary information, documents and reports are prepared and are kept in printed copies in our headquarters prior to the General Assembly meeting and are also shared with our shareholders through our Investor Relations Website, E-GAS and KAP. The relevant information and documents are also submitted to the attendees at the General Assembly meeting.

C. Press Releases, Bulletins and Announcements

Pegasus Airlines informs the public of material developments through controlled newsfeed to printed press and broadcast media. Data distributors such as Reuters and Bloomberg are also included in this scope of communication. Depending on specific circumstances such communication can be made through a press meeting. With the aim of easing access to information for investors Pegasus Airlines provides access to all such press releases, bulletins, and announcements through our Investor Relations Website.

7. PERSONS AUTHORIZED TO MAKE PUBLIC DISCLOSURE

Unless otherwise determined by the Board of Directors or in accordance with the authority granted by the Board of Directors, corporate spokespeople who are authorized to make press statements, bulletins and announcements to printed press, broadcast media and data distributors on behalf of Pegasus Airlines are the Chairperson of the Board of Directors, the CEO, the CFO, the Chief Commercial Officer, the Senior Head of - Investor Relations and persons authorized by the CEO in this

respect. Any press disclosure to be made by the members of the Board of Directors on behalf of Pegasus Airlines is subject to approval by the Chairperson of the Board of Directors.

Our Investor Relations Department undertakes communication on behalf of Pegasus Airlines, in coordination with the relevant departments at Pegasus Airlines to the extent necessary, with respect to the promotion of our company before existing and potential investors and financial institutions in and outside of Türkiye and responding to questions from the personnel of the said institutions or otherwise within the context of investor relations.

All disclosures to be made by the authorized spokespersons go through a preliminary internal review under the coordination of the Investor Relations and Brand Management Departments.

Pegasus Airlines employees cannot respond to queries from capital markets participants unless authorized to do so within the above framework. All information requests will be directed towards our Investor Relations Department.

8. COMMUNICATION WITH CAPITAL MARKETS PARTICIPANTS

Regular conduct of relations with capital markets participants, clarification of questions, studies relating to shareholders and investors and shareholder relations are undertaken under the coordination of our Investor Relations Department.

In line with the aforesaid purposes, Pegasus Airlines may, at its discretion, organize information meetings targeted at analysts, investors, financial institutions, or shareholders. These meetings may be held physically or by using methods such as conference call and video conference.

Our Investor Relations Department aims to respond to all meeting and information requests from shareholders positively and strives to provide the highest possible level of communication.

No inside information that has not been made public can be shared at non-public meetings with capital markets participants.

Only those who are authorized to make public statements on behalf of Pegasus Airlines can engage in communications with third parties at information meetings.

Besides meetings, information and documents published in the Pegasus Airlines Investor Relations Website provide shareholders, investors, analysts and other stakeholders with the possibility of following developments relating to Pegasus Airlines.

9. ANALYST REPORTS

The institutions preparing analyst reports are responsible for the content of such reports. Subject to obtaining the consent of the authors and indicating the source for the report, Pegasus Airlines may publish analyst reports on its website with the aim of providing alternative viewpoints to investors. Pegasus Airlines does not assume any responsibility to review, confirm or approve the content of analyst reports. However, without providing any commentary it may review the accuracy of the information contained in analyst reports in respect of publicly available information. Pegasus Airlines does not validate, approve or undertake the responsibility of or distribute the revenue models and expectations mentioned in these analyst reports.

Pegasus Airlines publishes the name of the analysts covering Pegasus Airlines and the institutions they work for in its Website.

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

Pegasus Airlines follows news and rumors in printed press, audiovisual media and the internet by daily review of the market.

As a general principle, Pegasus Airlines does not comment on unfounded news, market rumors and speculations that are not sourced to its disclosure.

In the presence of news or rumors with a potential to affect investment decisions and the value of capital markets instruments Pegasus Airlines makes material event disclosures with respect to the accuracy and/or sufficiency of such information within the framework of the capital markets legislation. However; Pegasus Airlines may refrain from making any statements if the information relates to a matter relating to which Pegasus Airlines has decided to postpone disclosures, until the reasons for postponement no longer exist.

Unless those authorized to make public disclosures on behalf of Pegasus Airlines determine otherwise, Pegasus Airlines does not provide any comments if the information fails to qualify as inside information.

11. ANNOUNCEMENT OF EXPECTATIONS AND TARGETS

Pegasus Airlines may, from time to time, disclose its future expectations within the framework of this Information Policy. The written documents where Pegasus Airlines discloses its future expectations clearly indicate that the potential risks, uncertainties and other factors may lead to actual results that are significantly different from expectations.

Future expectations may only be disclosed by those authorized to make public disclosures and subject to the foregoing disclaimers being mentioned or a reference to another written publicly available document.

Future expectations rely on reasonable assumptions and forecasts and the reasons for expectations and the relevant data are disclosed together with the expectations. These expectations cannot contain any unfounded or exaggerated forecasts, cannot be misleading and they should be related to the financial condition and results of operations of Pegasus Airlines.

In the event future expectations do not realize or it is determined that these will not realize, the matter will be promptly disclosed to the public in accordance with the procedures set out in this Information Policy and the relevant information will be revised.

12. SILENT PERIOD AND BLACKOUT PERIOD

Pegasus Airlines refrains from discussing financial results and related matters with capital markets participants in certain designated periods within the year to avoid asymmetric distribution of information and unauthorized disclosure relating to results of operations. The said periods are called "**Silent Periods**". A Silent Period commences fifteen days before the announcement of the financial statements for the relevant period on KAP and ends on the date when the results relating to the relevant period are published on KAP. Pegasus may organize and attend information meetings during the Silent Period with the attendance of the authorized spokespeople and these persons may attend conferences, panels, similar events and make written and verbal statements; however, information to be shared in this respect will be kept limited to the results relating to the period prior to the latest reporting period and information that has been previously disclosed to public.

In addition to Silent Periods Pegasus implements "**Blackout Periods**" during which those with regular access to inside information are prohibited from trading in Pegasus Airlines' shares. A Blackout Period commences the day after the date on which a half-year (six months) or full year (twelve months) financial accounting period concludes and ends upon the disclosure of the results relating to the relevant period on KAP.

13. PEGASUS AIRLINES INVESTOR RELATIONS AND PUBLIC INFORMATION SERVICES WEBSITES (www.pegasusyatirimciiliskileri.com; www.flypgs.com/bilgi-toplumu-hizmetleri)

Pegasus Airlines Investor Relations Website is efficiently used in informing the public and ensuring transparency and the information published in the Website is regularly updated.

Pegasus Airlines publishes the information and documents required to be published online as per the

applicable law and the CMB's Corporate Governance Principles in the Investor Relations and Public Information Services Website in accordance with the procedures and timing limitations set out in the regulations. Pegasus Airlines also provides access to any other disclosures made as per this Information Policy in its Website.

Pegasus Airlines ensures that the information published in the Investor Relations Website is consistent with the disclosure made elsewhere in accordance with the applicable law.

Pegasus Airlines Investor Relations Website is structured in a way to allow fast and easy access to information. Pegasus Airlines Investor Relations Website has sections in both Turkish and English.

Pegasus Airlines undertakes all measures relating to the security of the Pegasus Airlines Investor Relations Website.

Announcements in Pegasus Airlines Investor Relations Website are no substitutes for material event disclosures that have to be made as per the applicable law.

14. EFFECTIVE DATE

This Information Policy any amendments hereto will be adopted by a resolution of the Board of Directors and will be published on the Pegasus Airlines Investor Relations Website.