

	KOCAER STEEL CODE OF BUSINESS ETHICS GUIDELINE	Document No	IK.KL.001
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1. PURPOSE

WHY KOCAER CELIK- BUSINESS ETHICS RULES GUIDE HAS BEEN PREPARED?

This guide provides information on the business ethics rules that must be followed at Kocaer Çelik Sanayi ve Ticaret A.Ş., the responsibilities of the employees and what to do in cases that do not comply with the business ethics rules.

2. SCOPE

Kocaer Çelik Sanayi ve Ticaret A.Ş. is obliged to give a copy of this Guide to each employee, regardless of their rank and title , **to convey the content in orientation trainings, and to strictly comply with these rules.** This practice will be implemented within the Human Resources Systematics and its continuity will be ensured.

BUSINESS ETHICS RULES APPLY TO ALL OF US

Kocaer Çelik Sanayi ve Ticaret A.Ş. **respects social, political and cultural values in all geographies where it operates, with the reference of the United Nations Global Compact, and acts transparently and in accordance with the laws, business ethics rules. It attaches great importance to honesty, open communication and fair management.**

As employees of Kocaer Çelik Sanayi ve Ticaret A.Ş., honesty, business ethics and respect for other employees are our basic unchanging values. **When you are undecided about what to do and what behavior to show, our values are your guide.** Working at Kocaer Çelik Sanayi ve Ticaret A.Ş. **means accepting the obligation to do the right thing.** We should always be aware that we are responsible for learning and applying the rules of business ethics related to our work.

As well as complying with the Code of Business Ethics, it is **also an important responsibility of us as employees to report known or witnessed violations,** as ignoring and not intervening or reporting **an unethical situation can cause serious consequences.**

Especially those who work in managerial positions also have additional responsibilities in the implementation of business ethics rules. These are;

- To set an example for other employees with their behavior in accordance with the rules of business ethics,
- To ensure that the employees in the team fully learn the rules of business ethics,
- To listen to and support an employee who raises any ethical issue,
- To report unethical behaviors to the Ethics Committee,
- In case of violation of the rules, it is to take measures quickly and as soon as possible.

3. RESPONSIBILITY AND AUTHORITY

The Code of Business Ethics Guide is an integral part of the legal entity of Kocaer Çelik Sanayi ve Ticaret A.Ş. **Guide;**

- Kocaer Çelik Sanayi ve Ticaret A.Ş. Deputy General Manager of Human Resources,
- All employees without exception to its implementation,
- The Ethics Committee is responsible for the effective operation and reporting of the application.

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STRUCTURE AND FUNCTIONING OF THE ETHICS COMMITTEE

1. Structure of the Ethics Committee:

The Ethics Committee consists of 3 people. The Chairman of the Ethics Committee is the Deputy General Manager of Human Resources. The Legal Counsel of our Company is a member of the Board, and the Internal Systems Director is the Secretary General.

2. The main task of the Ethics Committee is:

It is responsible for taking an attitude that will contribute to the cultural change or its continuity that will enable the company employees to act in accordance with the "Code of Business Ethics", to provide guidance, to inform the employees about the content of the Ethics Committee duties, to investigate the issue immediately and as quickly as possible when reports of violations of the rules are received, and to report and report the results.

3. Meeting Order: The Ethics Committee holds its ordinary meetings 1 time in 3 months. In emergencies, it convenes upon the call of the Chairman of the Committee, without waiting for the ordinary meetings.

4. Functioning of the Ethics Committee:

- The Ethics Committee is responsible for concluding all issues received via e-mail, internal communication system (Excalibur), letter or telephone.

An e-mail address starting with "Ethics" is established (etik.kurul@kocaersteel.com) and it is announced in the "KOCAER Code of Business Ethics Guide" booklet distributed to the employees, on the company's online platforms or with a general announcement that they can send their questions and notifications on ethical issues to this address. In addition to this address, the postal address and a mobile phone number that can be reached are also published on these channels.

- The Board keeps the identity of those who make notifications and notifications confidential. Everyone who notifies the Ethics Committee is under the protection of the Ethics Committee due to these notifications and cannot be subjected to behaviors such as pressure, discrimination or mobbing.
- The chairman and members of the Board act independently and unaffected by the department managers they are affiliated with and the hierarchy within the organization while performing their duties in this regard.
- E-mails sent to the e-mail address to be determined should be accessible to all committee members. A copy of the e-mails sent to this address is forwarded to the members of the ethics committee. However, the Secretary General of the Ethics Committee is responsible for the continuous monitoring and reporting of e-mails. The Secretary General will record and archive all issues received by the Ethics Committee on a case-by-case basis.
- Decisions on the examination and research methods of the subjects decided to be examined by the Ethics Committee are made by the Ethics Committee in accordance with the subject priorities, without waiting for the meeting dates.
- Every 3 months, the Secretary General compiles the questions, suggestions and notifications regarding ethics and shares them with the ethics committee in a summary report. The "Quarterly Ethics Issues Report" includes the issues and actions taken during the reporting period.
- The Board will inform the Board of Directors of the Company through the Audit Committee through the Secretary General at regular intervals regarding the issues communicated. Report intervals are determined by the Ethics Committee and this period will not exceed 3 months. However, when information is

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requested by the Board of Directors or the Audit Committee, it will be met immediately and this period will not be waited. Emergencies are completely outside this scope.

- h. Urgent issues are reported by the Ethics Committee without waiting, investigated immediately, if necessary, the employee and/or manager who made the claim is invited, listened to, if necessary, expert opinion is obtained from the relevant Company units, within the scope of the relevant Laws, Regulations and Legislation; The situation is concluded and reported based on the Business Ethics Rules Guide and the Company Disciplinary Implementation Regulation.

WE HAVE TO REPORT VIOLATIONS OF BUSINESS ETHICS RULES

Business ethics rules specify the basic behaviors for doing the right thing. These rules may sometimes not respond to the situation we are in. In such a case, the legislative regulations related to the company's activities, the company's articles of association, internal regulations such as Regulations, Procedures, Instructions, and the established company policies and principles should be consulted and the managers should be consulted.

In addition to learning the rules, it is also very important to express concerns and question them when necessary.

When it is not sure that the work done is correct, when someone is witnessed doing something wrong, or when it is thought that something wrong has been done, the **issue must be reported to the Ethics Committee**. (See, e-mail, telephone, postal addresses at the end of this guide). Incoming issues will definitely be evaluated by the Ethics Committee.

It is right to question an issue or express a concern in good faith.

In our companies, interventions that will cause discomfort in such practices will not be allowed. If it is thought that an individual or someone else has been subjected to such treatment, the Ethics Committee should be applied immediately. **In our companies, it will be prevented to take a stance against such information, and if the opposite is observed, people who show this behavior will be contacted regardless of their level.** In addition, the same practice will apply to those who provide information that is made in vain and for the purpose of defamation and **those who provide information that unnecessarily distracts the Ethics Committee.**

The guide explains in general terms what needs to be done in many subjects, as its name suggests, the guide is the guide. We may not find the solution or answer to every problem we will encounter in this guide.

When faced with an issue that is not included in the guideline but causes hesitation, as a responsible employee, it is necessary to act with common sense and make an effort to make the right decision. However, if a satisfactory answer cannot be found, the Ethics Committee can be consulted for help.

OUR CODE OF BUSINESS ETHICS

Kocaer Çelik Sanayi ve Ticaret A.Ş. Code of Business Ethics can be summarized under 14 headings.

1. WE WORK IN A SAFE WORK ENVIRONMENT, NOT ALLOWING DISCRIMINATION, RESPECTING EACH OTHER'S PERSONAL RIGHTS

Kocaer Çelik Sanayi ve Ticaret A.Ş. does what is necessary to create a healthy, safe and professional business environment. It supports the Universal Declaration of Human Rights and respects declared rights. It does not cooperate with any business, government or individual whose human rights are violated.

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In the professional business environment, our companies do not tolerate verbal or physical harassment and insults among employees, and do not discriminate based on nationality, race, gender, ethnicity, religion and marital status. They do not engage in activities that restrict the freedom of work of the person such as forced and compulsory labor, slavery, detention, confinement to the workplace.

We understand the modern management approach to share a human-oriented perspective, to believe that our employees are our most valuable assets, to protect them and to act sensitively to their needs. We believe that this approach is the most valid way to create company performance.

We give all our employees the opportunity to develop, train and advance themselves. We pave the way for our employees who have the necessary qualifications, show outstanding success and prove that they are capable of undertaking the responsibilities required by a higher position.

Safe working environments are one of the top priorities. Since the issue of safety is more important, especially in production facilities, Kocaer Çelik Sanayi ve Ticaret A.Ş. is managed with safety rules that must be followed. Learning and complying with these rules are among the main duties of employees.

Kocaer Çelik Sanayi ve Ticaret A.Ş. keeps the personal information of its employees in full confidentiality. Only authorized persons access this information and use this information within the principle of confidentiality. Maximum care is taken in the use and protection of personal information, including but not limited to the "Personal Data Protection Law".

Confidentiality should not be understood as the right of employees in the business environment to remain confidential of information consisting of activities that are not acceptable to be carried out for personal purposes. As mentioned before, business e-mails and company computers should not be used for purposes other than company purposes, as they are provided to us for the purpose of performing our duties. Kocaer Çelik Sanayi ve Ticaret A.Ş. may monitor and analyze personal information created, used, transferred or stored in Information Systems or communication environments under certain conditions when necessary.

Regarding information security, we are obliged to comply with the working and service conditions in the "Acceptable Use Policy" and "Employee Data Security Commitment" in all transactions and studies in the electronic environment.

We know that it is wrong to cause psychological discomfort to other employees or people in our team and to create pressure in the workplace, and that this will reduce the work performance of other employees.

(Example: obstructing communication, attacking social relations, attacking reputation, attacking quality of life or professional status, etc.)

2. WE USE COMPANY RESOURCES EFFICIENTLY

Time is an important resource. Therefore, in order to be successful, employees should take care to use their own and their colleagues' time effectively.

The company's resources should not be used for personal affairs.

It is among the important responsibilities of the employees to act with common sense in using all kinds of resources of the company (computer, telephone, internet, fax, photocopy, cash, vehicle, gasoline, office tools, stationery, computer programs and software, etc.) efficiently while performing their duties.

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Workplace resources are provided to employees to use while doing their jobs. All kinds of resources should be used carefully, sparingly and in the most efficient way, and waste should be avoided.

Working efficiently is a part of our culture. Special efforts should be made to be efficient while doing our job, and it should not be forgotten that inefficient work and all wastes negatively affect the company's bottom line.

3. WE AVOID CONFLICT OF INTEREST

If our families or relatives gain personal benefit by taking advantage of our position within the company, if it makes us lose our loyalty and objectivity about our work, this is a conflict of interest.

If it is known or learned that relatives (relatives up to the 3rd degree due to blood ties and marriage) are in a business relationship with competitors, customers or suppliers, this should be reported to the managers immediately, and the manager should report this situation to the Ethics Committee.

The Ethics Committee will evaluate the issue and provide guidance on what needs to be done.

The general principle is not to enter into any business relationship with the relative employee or his team. In very special cases, if a permit is required, approval should be obtained by applying to the Chairman of the Board of Directors of the Company.

The confidential and commercial information of the company should not be shared with relatives or 3rd parties.

As employees, private investments and partnerships made by us and our relatives should not have any impact on us and should not prevent us from being objective when making decisions.

If such investments are made to competitors, customers or suppliers, a conflict of interest is likely to arise. If there is such an investment, it should be reported to the manager and the Ethics Committee immediately.

Examples of investments that should definitely not be:

- In case of being involved in the purchasing or purchasing decision process, one should never be a partner in the business of a supplier with whom one has a business relationship.
- Likewise, in case of being involved in the sales officer or sales decision process, one should never invest in the business of a customer with whom one has a business relationship.

We know that it is wrong to gain personal benefit by using the name of the company.

It is unacceptable for employees to use the name of the company in their private lives to provide themselves with benefits such as discounts, free services, etc. In case of doubt, managers or the Ethics Committee should be consulted.

We look out for the benefit of the company in all your work.

It is unacceptable for employees to create environments for the purpose of obtaining financial benefits from 3rd parties with whom they have a business relationship. It should be strictly avoided to enter into business relationships with certain companies by using their position in order to gain self-benefit.

We avoid entering into a business relationship outside the company with existing and potential competitors, customers and suppliers.

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Having an additional business or partnership outside the company and being in contact with the company's competitors, customers and suppliers should be avoided as it will lead to a conflict of interest, and in cases where it is not sure, the managers or the Ethics Committee should be consulted.

We receive and give gifts from various persons and organizations with whom we are in contact for business reasons, only within the framework of the rules set out in the Code of Business Ethics Guide.

Kocaer Çelik Sanayi ve Ticaret A.Ş. acts in accordance with the principles of trade when doing business with other companies. Although the gifts received/given in these relations play a positive role in the improvement and development of relations, they can also lead to a dangerous conflict of interest by moving employees away from being objective.

Gifts that can be bought and given can be evaluated in three groups.

a) Gifts that can be bought/given:

The values of some gifts may be too small to require approval. In business relations with the same person or company; Gifts received or given at one time, with a value not exceeding 100 USD, are included in this group.

These may be gifts such as tickets, invitations or promotional materials related to cultural activities, provided that they are not in group (b) below. Business dinners should also be in reasonable numbers and within reasonable amounts.

b) No way Gifts that cannot be bought or given:

- Is illegal or will ultimately violate the law,
- Cash, check or equivalent to any money (such as gift certificates, stocks),
- To do or not to do something in return,
- Violate the rules of the organization that will receive the gift,
- It will discredit the company,
- Gifts whose expenses cannot be recorded in the company's accounting records

If a gift that cannot be received in any way (Example: a gift worth cash, check and money) should be sent back immediately. If we cannot send the gifts back, the Department Manager and the Ethics Committee through the General Manager should be informed about the use of the company or donation.

c) Gifts that should always be approved:

In order to determine the path to be followed for gifts other than the two groups listed above (with a total value exceeding 100 USD at once), it is necessary to first inform the manager and then apply to the Ethics Committee through the Department Manager or General Manager.

4. WE COMPLY WITH THE COMPETITION RULES DETERMINED BY THE LAW AND COMPETE WITH COMPETITORS IN A WAY THAT DOES NOT DISRUPT THE MARKET CONDITIONS

Kocaer Çelik Sanayi ve Ticaret A.Ş. has to fight its competitors on the way to success and while doing this, it has to act in a way that is sensitive to the law and does not disturb market conditions. **Employees are expected not only**

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to avoid bribery, bullying and other forms of corruption, but also to comply with policies and procedures prepared against corruption. (See: Anti-Bribery and Anti-Corruption Policy)

1. Competition rules may vary from country to country and serious sanctions may arise if they are not complied with. Entering into price collaborations and implementing plans to destroy competitors are ways of doing business that are contrary to competition rules.
2. Sometimes even seemingly simple behaviors can violate competition rules. Never, anywhere, with competitors; Issues that will disrupt competition rules such as price, sales conditions, market sharing should not be discussed.
3. It is free by law to collect and use publicly available information about competitors as part of competition in the market. Examples of these are news in the press, consumer surveys, trade fairs, information published on the internet, industry-wide research conducted by certain consultant firms. Competitors' intellectual assets such as R&D, brand, copyrights should be sensitive and this information should not be tried to be accessed.
4. If there is hesitation about accepting or using information about competitors, the Legal Counsel or the Ethics Committee should be consulted.
5. In addition to competition, our companies should be cautious against products entering the country illegally, and ensure that customs procedures related to imported goods are carried out in accordance with the rules and completely. International rules and restrictions regarding foreign trade should be complied with, and relevant employees should be informed about these issues. Necessary measures should also be taken against laundering activities of unknown origin and should not enter into any business relationship with those who engage in these activities.
6. It is necessary to be transparent in business relations with official authorities, obtaining confidential tender information in advance, submitting documents and information that do not reflect the truth, exchanging gifts with officials without the knowledge of the Ethics Committee are unacceptable behaviors.

5. WE ATTACH IMPORTANCE TO CUSTOMER SATISFACTION AND ALWAYS TREAT OUR CUSTOMERS SENSITIVELY AND HONESTLY

Kocaer Çelik Sanayi ve Ticaret A.Ş. always has to be sensitive and honest with its customers.

Kocaer Çelik Sanayi ve Ticaret A.Ş. does not make advertisements based on abuse that contain misleading information.

Producing defined, high-quality products that meet customer needs is a crucial step in achieving success. That's why our companies produce products that comply with the law, meet high quality standards, store them under the required conditions and deliver them to their customers.

If a quality-related issue is noticed, it should be reported immediately to the immediate supervisor or department manager.

Information about customers should be protected with confidentiality, and only authorized persons should have access to this information.

6. WE ACT WITH THE AWARENESS OF OUR RESPONSIBILITIES TOWARDS OUR SHAREHOLDERS

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In order to maintain the trust of our shareholders in our institution, we make our decisions based on economic data and ensure that our resources and assets are managed in the most efficient way with an understanding of financial discipline and accountability. We take care to make our investments in areas that will increase our competitiveness and provide high returns on our shares, taking into account sustainable profitability.

We use our resources effectively and efficiently; we manage with the awareness of savings in favor of our shareholders, and we implement strategies that create growth-oriented value by avoiding unnecessary and unmanageable risks.

We develop and implement an honest, transparent and sustainable reporting system that complies with legal regulations and rules on the basis of commercial and financial discipline.

We regularly provide information flow to the necessary persons, institutions and organizations. In the statements we make to the public and our shareholders; We provide timely, complete, accurate and understandable information about our financial statements, strategies and investments within the scope stipulated by the legislation. We comply with legal regulations regarding the purchase and sale of the shares of our public companies and avoid situations that may create a conflict of interest.

7. WE ALWAYS TAKE CARE TO ACT HONESTLY AND FAIRLY IN OUR RELATIONS WITH OUR SUPPLIERS AND BUSINESS PARTNERS

We act honestly, respectfully and fairly in our relations with our suppliers and business partners, whom we believe have an important share in the quality of our products and services, in accordance with the relevant international and local legislation. We take care to make decisions in line with objective criteria in the selection of our suppliers and business partners with whom we prefer to work in cooperation for a long time.

We expect our suppliers and business partners to carry out their activities in accordance with laws, regulations and Kocaer Steel Code of Ethics. In this context; We ensure that they fulfill their legal obligations, respect human rights, comply with standards such as employee rights and environmental protection. We support them to act in accordance with the principles of business ethics and anti-corruption.

8. WE STAND AT AN EQUAL DISTANCE TO PUBLIC INSTITUTIONS AND ORGANIZATIONS, NON-GOVERNMENTAL ORGANIZATIONS AND POLITICAL PARTIES WITHOUT ANY EXPECTATION OF BENEFIT

We act in line with the principle of equality in our relations with public institutions and organizations. While carrying out our activities, we act with the principle of keeping an equal distance from these public institutions and organizations, non-governmental organizations and political parties. We comply with the requirements of laws and regulations; we do not enter into a relationship of interest with public officials, political persons and their representatives, with or without material value. We pay attention to sharing the information that needs to be disclosed to the public in an accurate, consistent and timely manner, and we are sensitive about protecting internal information that should not be shared with the public.

9. WE ESTABLISH REGULAR, OPEN AND TRANSPARENT COMMUNICATION WITH THE MEDIA. OUR SENSITIVITY TO OUR CORPORATE CULTURE; WE PROTECT SOCIAL MEDIA CHANNELS IN THE SAME WAY AS IN TRADITIONAL COMMUNICATION CHANNELS AND MANAGE THESE CHANNELS WITH THIS UNDERSTANDING

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We carry out all our content activities such as opinions, statements, news studies and interview requests from media institutions within the knowledge of the Corporate Communications Department. We do not discriminate between media institutions and stand at an equal distance from all of them. We do not include information that will mislead the public in our statements to the media.

We make statements about our company only through our corporate spokespersons. We do not make public statements as any employee or manager other than our corporate spokespersons. In the statements made, we do not include expressions that will damage the reputation of the institution and are incompatible with the corporate culture, and we never use expressions that discriminate in any way, political, hateful and insulting discourses.

Our employees do not share posts that praise the crime and/or the criminal on their personal social media accounts. From our employees; in all digital media, especially social media,

We expect them to be sensitive to the sensitivities we have stated in traditional communication channels in their posts about our company. As an institution, we request that they do not include issues that we do not produce, that will damage the reputation of our institution and our employees, that are not included in our corporate culture and that exceed their jurisdiction. We do not share unverified information about our Company, except for official statements on social media, and we know that it is essential to protect confidentiality.

10. THE COMPANY TAKES MAXIMUM CARE TO PREPARE ITS INFORMATION, ASSETS AND RECORDS CORRECTLY, PROTECTS THEM WITHIN THE PRINCIPLE OF CONFIDENTIALITY, AND DOES NOT USE THEM FOR BENEFIT

Employees should take care to prepare any information/documents correctly during their duties. All company records must be prepared correctly, on time, and in accordance with the law. It is unacceptable to knowingly make false statements, take irregular actions, and damage company assets (financial, tangible assets, property rights, etc.).

1. The reputation of a company depends on many conditions. One of the most important of these is that the accounting records are accurate and orderly. Kocaer Çelik Sanayi ve Ticaret A.Ş. undertakes to provide its shareholders with full, accurate and understandable information about the status and financial results of the companies in a timely manner. While doing this, it complies with the applicable legislation and accounting rules. While creating the company's accounting records, employees must fully comply with the accounting rules and create timely and accurate information.

2. In addition to financial information, companies' commercial information, patents, trademarks and copyrights are also of great importance for companies. Since this information is obtained as a result of many years of efforts of companies, it is protected by laws and regulations. Data related to sales and marketing, marketing strategies, research and development results, projects, contracts, product formulas, new product ideas can be given as examples of this type of information. This information must be protected within the principle of confidentiality.

3. In some cases, it may be necessary to share company information with people outside the company. Even if there is a sufficient reason, in principle, this information should not be shared in any way without the permission of the manager and without a confidentiality agreement.

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4. Company employees should never use or share their own positions, company resources and information for personal benefit.
5. Personal trading of securities and other capital market instruments traded on domestic/foreign stock exchanges should never be engaged in during working hours.
6. Computer systems play a very important role in making things easier, faster and more accurate. These systems should be used properly and the information they create should be protected.
7. Shareholders, investors, financial institutions rely on the information that companies will disclose about their performance and financial results, act on them and make decisions.

Employees who have the authority to make public statements on behalf of Kocaer Çelik Sanayi ve Ticaret A.Ş. cannot make these statements to specific, privileged groups.

It is obligatory to share important information with the public simultaneously. Company employees may be authorized to answer questions from different groups within the scope of their duties. However, when there is a need to disclose information that has not been disclosed to the public before, the issue must be forwarded to the Chairman of the Board of Directors.

8. Media statements and press conferences require special attention. No employee other than those authorized can make a statement about the company, whether official or not.
9. It is of great importance that financial records as well as other company records are stored and managed correctly and properly. Some information specified by law must be kept completely and regularly. Employees are always required to keep the necessary records of their work correctly. Records that have been tampered with and will cause inaccuracies may pose a serious threat to the company. Records and files related to lawsuits should be kept and managed within the knowledge of the Legal Counsel.
10. In some cases, official authorities may request inquiry, investigation and information within the framework of the law. In these cases, accurate and complete information must always be provided to the authorities. In order for the action to be taken to be complete, when necessary or to avoid any mistakes, it is essential that the General Manager of the Company is informed about the information to be provided, if any, when such an issue comes to the fore.

11. WE USE AND PROTECT ALL OUR ASSETS IN AN APPROPRIATE MANNER

It is a general rule to use all assets and resources belonging to our Company in accordance with their purpose and to avoid using them for personal and third party benefit. We use the tangible and intangible assets and resources of the Company only to carry out the business of the Company or within the principles and procedures permitted by the management.

In addition to the efficient use of our Company's assets and resources, our employees and stakeholders; It is also one of the general responsibilities of our employees and stakeholders to take all necessary measures to protect tangible (cash and cash equivalents, stock, company vehicles, machinery and equipment, electronic devices, etc.) and intangible (information and information systems, trademark, reputation, intellectual property rights, trade secrets, etc.) assets belonging to the Company.

We expect them to avoid behaviors and actions that may harm this responsibility and put our Company in a difficult situation, and to act with the awareness and responsibility of saving money while performing their duties.

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We take all kinds of measures to prevent all tangible and intangible assets of our Company from being stolen or damaged; accordingly, we ensure that assets and resources are protected against possible loss, damage, misuse, abuse, theft and sabotage.

12. AS KOCAER STEEL EMPLOYEES, WE CONSIDER SOCIAL BENEFIT AND RESPECT THE ENVIRONMENT IN ALL OUR ACTIVITIES

Among the values of Kocaer Çelik Sanayi ve Ticaret A.Ş. are to produce with an approach that values the environment and nature, to contribute to creating a better tomorrow than today in environmental and economic terms, and to be aware of corporate social responsibility.

1. Kocaer Steel Industry and Trade Inc. takes care to protect natural resources and acts with environmental awareness. **It supports economic measures to protect the environment and does not use scientific uncertainties as an excuse to postpone action on environmental issues.**

In addition to environmentally responsible business and risk management, it supports long-term sustainability and drives innovation in an increasingly resource-scarce world.

In addition, Kocaer; Environmentally friendly technologies support technologies that protect the environment, reduce pollution, use all resources more sustainably, recycle more waste and products, and/or manage waste much more effectively from resources that can be used instead.

2. They try to meet the expectations of the society in the best way with the quality products they produce. Each of us as employees has an important role in fulfilling this responsibility.

3. Kocaer Çelik Sanayi ve Ticaret A.Ş. does not allow child labor. It complies with the working age determined in the Labor Law and strives to ensure that the companies it does business with comply with it.

13. WE ADOPT A LIFESTYLE THAT WILL NOT CREATE A NEGATIVE OPINION ABOUT THE COMPANY IN OUR SOCIAL LIFE OUTSIDE THE WORKPLACE AS WELL AS IN THE WORKPLACE AND WILL NOT CONTRADICT THE RULES OF THE SOCIETY WE LIVE IN.

Employees should take care to provide a standard of living in accordance with their income sources and pay attention to the fact that their personal loan use, the amount of their debts and their repayments are in accordance with their income.

No one, including subordinates and superiors, can be forced to enter into a debt-surety relationship with each other.

Provided that they do not disrupt their work and do not receive a fee, they can become a member of social organizations (foundations, professional and social associations, sports clubs, parents' associations, etc.).

During their duties in the company, employees cannot accept any assignment or make donations on behalf of the company for the purpose of supporting political parties and organizations on behalf of the Company or the Group.

They cannot spend their working time or the company's assets on such practices. Companies approach all institutions and organizations without expectation of benefit, and stand at an impartial and equal distance from non-governmental organizations.

14. WE TAKE CARE OF THE CONFIDENTIALITY OF INSIDER INFORMATION

Prepared by DEPUTY GENERAL MANAGER OF HR	Approved by GENERAL MANAGER
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Insider information is defined as information, events and developments that have not yet been disclosed to the public that may affect the value and price of capital market instruments or the investment decisions of investors.

In accordance with the relevant communiqués of the Capital Markets Law No. 6362, our publicly traded Company complies with the legal regulations regarding the trading of shares and we do not use insider information (all kinds of commercial, financial, technical and legal, etc.) that have not yet been disclosed to the public for the purpose of benefiting ourselves or third parties (insider information trading / information abuse).

Insider information trading / information abuse; It is against the law and involves various criminal sanctions, including imprisonment and serious fines. As employees of our company; In case we leave our job, we take care to take the necessary measures to protect confidentiality and to comply with our confidentiality obligation. Our confidentiality obligation covers all Kocaer Group Companies; We announce all our official statements to shareholders, investors and the public in a complete, accurate, simultaneous and understandable manner in line with the principle of equality through the persons and/or units authorized by our company.

ETHICS COMMITTEE'S CONTACT INFORMATION

E-MAIL: etik.kurul@kocaersteel.com (All Ethics Committee Members use)

PHONE: +90 539 517 96 57

LETTER ADDRESS:

CHAIRMAN OF THE ETHICS COMMITTEE

Kocaer Steel Industry and Trade Inc.
Yeni Foça Yolu 2. KM - A2- Factory -
Aliaga / IZMIR

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