KOCAER STEEL
COMPETITION COMPLIANCE POLICY

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At Kocaer Steel, we believe that free and fair competition creates value for our customers, our industry and the national economy, and that our lasting success can only rest on **a competitive advantage earned through product quality, efficiency and service excellence**.

Our objective is to ensure full compliance with competition legislation in all the markets in which we operate, first and foremost Law No. 4054 on the Protection of Competition, to prevent competition law risks, and to make compliance an integral part of the way we do business every day.

This policy covers the members of our Board of Directors, our executives and all our employees, as well as agents, representatives, consultants and contractors acting on behalf of the Company. It applies to all our domestic and international sales, export, raw material procurement, import, production planning, logistics and human resources practices, and to our representation activities within industry organizations.

In line with this approach, we commit to:

- **Independent Commercial Decisions:** Making our decisions on prices, production and sales volumes, capacity, customers, markets and bidding terms solely on the basis of our own commercial judgment; and never determining these decisions jointly with our competitors;
- **Keeping Distance from Competitors:** Refraining from any agreement, concerted practice or cartel activity that restricts competition, such as price fixing, allocation of customers, territories or tenders, and restriction of supply; and neither sharing with nor receiving from our competitors competitively sensitive information such as prices, costs, volumes, capacity, inventory, customers and investment plans;
- **Responsible Use of Market Power:** Not using our position in the markets in which we operate for anti-competitive purposes such as excluding competitors from the market, applying discriminatory conditions or preventing market entry;
- **Responsible Participation in Industry Organizations:** Conducting our membership and representation activities in industry associations, unions and non-governmental organizations in compliance with competition law; and, whenever a competitively sensitive topic is raised in such settings, declining to take part in the discussion, leaving the meeting and recording the situation;

- **Freedom in Customer and Sales Channels:** Not determining the resale prices of our customers; not unlawfully restricting their sales channels, territories or customers; and ensuring that our relationships with agents and intermediaries do not serve as a conduit for the flow of information between competitors;
- **Independence in Procurement and Purchasing:** Independently determining the purchase price and origin of billets and other raw materials and our choice of suppliers; and not coordinating with our competitors on the purchasing side either;
- **Compliance in the Labor Market:** Not entering into no-poach or wage-fixing agreements with other employers and not sharing information on wages and benefits; and not using the confidential information of previous employers brought by employees joining us from competitors;
- **Compliance of Contracts and Collaborations:** Assessing in advance the compliance with competition rules of the contracts and cooperation agreements we enter into with customers, suppliers, business partners and competitors; and observing the Turkish Competition Authority's approval requirements in mergers, acquisitions and joint ventures;
- **Protection of Commercial Information and Accurate Records:** Protecting our trade secrets and confidential information that may affect our competitiveness; and recording the basis of our commercial decisions clearly and accurately, using Company communication channels and complying with our document retention rules;
- **Cooperation with the Turkish Competition Authority:** Cooperating fully with the Turkish Competition Authority in on-site inspections (dawn raids) and requests for information; and not obstructing inspections or concealing, altering or destroying any information or documents;
- **Compliance in International Operations:** Observing the competition rules of the countries to which we export and of the European Union, and conducting our international activities in accordance with these rules;
- **Training, Advice and Reporting:** Providing our employees with regular training on competition law; ensuring that our Legal Counsel is consulted before taking action in case of doubt; enabling potential violations to be reported to our Legal Counsel or through the Ethics Hotline; and protecting those who report in good faith against retaliation;
- **Accountability and Sanctions:** Evaluating conduct contrary to this policy within the framework of our disciplinary regulations and applying sanctions up to and including termination of employment; and treating knowingly turning a blind eye to a violation as conduct that also gives rise to accountability.

We regard fair competition as the guarantee of the value we offer our customers and of our corporate reputation, and we tolerate no practice that is contrary to competition law.

This policy enters into force upon the approval of our Board of Directors. The policy is owned by our Board of Directors; our General Manager is responsible for its implementation; and our Legal Counsel is responsible for running the compliance program, providing advice and reviewing the policy. We review the policy at least once a year and whenever legislation changes, communicate it to our employees and business partners, and share it with the public on our corporate website.