KOCAER STEEL
CONFIDENTIALITY OF INSIDER INFORMATION AND PREVENTION OF INSIDER TRADING POLICY

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At Kocaer Steel, we believe that protecting the confidentiality of insider information is one of the cornerstones of investor confidence, our corporate reputation and the fair and transparent functioning of the capital markets.

Our objective is to prevent the unauthorized use and disclosure of information that has not yet been made public, to apply effective controls against insider trading, and to ensure that the persons concerned comply with their confidentiality, trading restriction and notification obligations.

This policy covers the members of our Board of Directors, our executives and employees at our headquarters, all our production facilities and our subsidiaries; and the consultants, auditors, rating agencies, suppliers and business partners who may have access to insider information, together with their employees and representatives. The confidentiality obligation applies to everyone who has access to insider information, whether or not they are included in the insider list.

This policy complements our Information Policy, which sets out the principles of public disclosure, and focuses on protecting insider information until it is made public, on trading restrictions and on the prevention of insider trading.

In line with this approach, we commit to:

- **Assessment of Insider Information:** Treating as insider information any information, event or development that has not yet been made public and that may affect the value or price of capital market instruments or the decisions of investors; and examining, on a case-by-case basis and in line with the Material Events Guidelines, its precision, its significance for investors, the advantage it may give to the person using it and its likely market impact;
- **Need-to-Know Sharing:** Sharing insider information only with those who need it to perform their duties, and only to the extent necessary; and preventing unnecessary disclosure and unauthorized access;
- **Confidentiality with Third Parties:** Obtaining a written confidentiality agreement or undertaking before any disclosure to external parties made out of legal or commercial necessity; and clearly setting out in contracts the Company's status as a publicly traded company, the counterparty's obligations regarding insider information and its liability in the event of a breach;

- **Secure Communication and Document Handling:** Marking correspondence containing insider information as confidential and adding warnings where necessary; not discussing such information in public places; applying clean desk and clear screen principles; avoiding unnecessary printouts; and securely destroying unnecessary or obsolete copies;
- **Confidentiality in Strategic Projects:** Using project code names and project communication groups with access restricted as far as possible in mergers, acquisitions, major investments and restructuring; and informing project teams of confidentiality obligations and trading prohibitions at the time of their assignment;
- **Information Systems and Physical Security:** Protecting insider information under our Information Security and Information Systems Management Policy and related procedures; and applying access control, authorization, encryption, network security, patching, data loss prevention, incident management and physical security measures under the responsibility of the Information Technology Department and process owners;
- **Insider List and Notification:** Notifying the persons who have regular access to insider information to the Central Securities Depository and Trade Repository of Türkiye (MKK); updating additions, removals and other changes to the list through our Investor Relations Department within two business days at the latest; and informing the persons included in the list in writing of their obligations, trading prohibitions and potential sanctions, and documenting this notification;
- **Persons Discharging Managerial Responsibilities:** Identifying, in accordance with the criteria set out in legislation, the members of our Board of Directors and other persons who have regular access to insider information and are authorized to take managerial decisions affecting the Company's development and business objectives; specifying the relevant titles in our Information Policy and in our corporate governance information on the Public Disclosure Platform; and determining the scope of persons closely associated with them in accordance with Communiqué No. II-15.1;
- **Prohibition of Insider Dealing and Recommendations:** Ensuring that our employees, executives, persons closely associated with them and our business partners who possess insider information do not, until the information is made public, buy, sell, short-sell, trade on margin, pledge or provide as collateral the Company's shares, share-based instruments, debt instruments or related derivatives, and do not make any recommendation or comment based on that information; and maintaining these obligations after leaving the Company with respect to information that has not been disclosed;

- **Public Disclosure and Loss of Confidentiality:** Treating insider information as disclosed only once an announcement has been made on the Public Disclosure Platform (KAP) in accordance with legislation; not treating press or social media posts as a substitute for this announcement; and, where the confidentiality of information whose disclosure has been delayed can no longer be maintained, informing the Investor Relations Department immediately to ensure that the information is disclosed in accordance with legislation;
- **Closed Periods:** Ensuring, as an internal rule, that persons who possess insider or continuous information, as well as their spouses, children and persons living in the same household, do not trade in the Company's capital market instruments from the day following the end of each 3-, 6-, 9- and 12-month reporting period until the financial reports are made public; announcing these dates in advance; maintaining the trading prohibition outside these periods while in possession of undisclosed insider information; and recommending that they wait at least one business day after disclosure;
- **Pre-Clearance of Transactions:** Ensuring that persons discharging managerial responsibilities obtain the opinion of our Investor Relations Department on their notification obligations at least two business days before a planned transaction, and renew this assessment for transactions not executed within two business days following the opinion;
- **Transaction Notifications:** Monitoring the disclosure obligations arising from the transactions of persons discharging managerial responsibilities, persons closely associated with them and the parent company, based on the relevant capital market instrument and the current annual thresholds; ensuring that the person carrying out the transaction promptly makes the notification required by legislation, and communicating the current thresholds to the persons concerned; and observing the separate notification obligations relating to changes in shareholdings and voting rights;
- **Repayment of Short-Term Gains:** Ensuring that net gains obtained by executives and controlling shareholders within the scope of Communiqué No. VI-103.1 from transactions completed within a period of six months or less are paid to the Company within thirty days of being obtained, subject to the exceptions provided in legislation, and that this process is monitored by our Investor Relations Department;

- **Protecting Market Confidence:** Preventing insider trading, market fraud and market abuse; and applying the necessary controls against the unauthorized transfer of information, misleading transactions, the dissemination of false or misleading information, news and rumors, and the concealment of information that should be disclosed;
- **Reporting of Breaches and Accountability:** Encouraging suspicious situations to be reported to the relevant senior executive or through the Company's reporting mechanisms; preventing retaliation against those who report in good faith; and, in the event of a breach, initiating the applicable disciplinary, legal and contractual proceedings, including termination of employment or third-party contracts, without prejudice to administrative and criminal sanctions;
- **Training and Awareness:** Regularly informing our employees who have access to insider information and the persons included in the insider list about confidentiality, trading prohibitions, notification obligations and potential sanctions; and providing an initial briefing to those newly appointed or added to the list for the first time;
- **Compliance with Legislation and Internal Regulations:** Complying with Capital Markets Law No. 6362, the relevant provisions of Turkish Commercial Code No. 6102, Communiqués No. II-15.1, VI-104.1, VI-103.1 and II-17.1, the Material Events Guidelines and the relevant principle decisions of the Capital Markets Board of Türkiye, as well as our Articles of Association, our Code of Ethics Policy and our Information Policy.

This policy enters into force upon the approval of our Board of Directors. Responsibility for its implementation, monitoring and updating lies with our Board of Directors, and oversight of day-to-day implementation lies with our Investor Relations Department. We review the policy periodically in light of legislative and organizational changes, update it with the approval of the Board of Directors when necessary, and communicate it to our employees and relevant parties and to the public through our corporate websites.