



**KOCAER STEEL
CODE OF ETHICS POLICY**



Kocaer Steel,

In order to provide guidance on framing and implementing the code of ethics and principles that all employees, business partners and suppliers are expected to comply with, covering all businesses and activities, and the governance structure in this regard;

Regarding Legal Responsibilities;

- In order to carry out its activities in a sustainable manner and protect the environment, designs investments and power plants in accordance with the relevant legislation and regulations, and goes beyond legal requirements wherever possible. While carrying out all domestic and international activities, acts within the framework of laws and international law, works in cooperation with all public institutions and organizations, and accordingly provides all requested kinds of information, documents, documents and notifications in a timely and understandable manner.
- Shows sensitivity in complying with the rules and requirements of all legislation related to the Company's activities, especially financial legislation and environmental legislation, and expects the same from third parties and institutions with which it cooperates. Always honest in dealings and communication with public officials, and does not try to influence their decisions with gifts, aid, bribes or other unethical offers.
- Takes utmost care to prepare its information, assets and records correctly, protects them in accordance with the principle of confidentiality, and does not use them for profit. In some cases, it may be necessary to share company information with people outside the company. In these cases, information is not shared in any way without a confidentiality agreement.

Regarding Responsibilities Toward Customers;

- Primarily aims to meet customer expectations at the highest level in all areas where does business and operates. From this point of view, constantly works to develop new products that will increase the quality of life of customers and encourage responsible consumption by predicting the needs of customers in the most accurate way. Attaches importance to customer satisfaction and always treats customers sensitively and honestly. Constantly renews and improves itself by taking into account customer satisfaction and all kinds of feedback from customers. Works with a customer-oriented working approach that responds to all customers' needs, demands and expectations as soon as possible and focuses on resolving any problems that may arise as soon as possible.

- Guarantees the confidentiality of all customers' personal data and undertakes not to share this data with third parties without the consent of its customers, except for legal obligations or court orders. The collection, use, processing and storage of customers' personal data is carried out in a way that guarantees privacy rights and complies with relevant legal regulations.
- Providing services on time and under the promised conditions is one of the basic principles of the company. Addresses both internal and end customers primarily within the framework of respect and courtesy, and exhibits a transparent and honest approach. Takes care to arrange the commercial agreements with customers in a way that will avoid misunderstandings and acts with the principle of transparency in the pre-agreement processes.
- Does not make exploitative advertisements containing misleading information.
- Produces products in compliance with the law and at high quality standards, stores them under the necessary conditions and delivers them to its customers.

Regarding Responsibilities Towards Employees;

- Values its employees as most important resource and acts with an understanding that will ensure that they work in good conditions, in harmony, satisfied with their jobs and embracing the job.
- Evaluates candidates according to objective criteria during recruitment processes. Makes selections based on talent and ability to meet the requirements of the position, and offers equal opportunities to all candidates. Ensures that no discrimination is made against any employee due to personal characteristics such as language, religion, ethnicity and gender, in all processes from the recruitment phase to career and wage practices, and does not allow situations to the contrary.
- Safe working environments are top priorities. Since the issue of security is more important, especially in production facilities, the Company is managed with security rules that must be followed. Learning these rules and complying with them are among the basic duties of employees.
- Ensures that its employees fully and completely exercise their rights arising from the law and the contract. Respects the rights of freedom of representation and collective bargaining.
- Supports the personal and professional development of employees and provides them with the training they need. Values employees as individuals, keeps their personal information confidential and uses this information only within the framework required by law.
- Does what is necessary to create a healthy, safe and professional work environment.
- No one, including subordinates and superiors, can be forced to enter into a debt-guarantee relationship with each other.

Regarding Responsibilities Towards Competitors;

- Believes in the necessity of the free market in business life and acts to maintain the competitive structure in all its activities such as price determination, buying and selling conditions, discounts and customer selection. Complies with the competition rules determined by law within the code of ethics, and competes with competitors in a way that does not disrupt market conditions .
- Does not try to learn confidential information about competitors, does not rely on information received by outside of legal means, and does not use such information. Does not make any statements or actions that humiliate or damage the reputation of competitors. Respects their copyrights. Expects his competitors to behave the same way.
- In all kinds of marketing activities such as products, services, promotions, especially advertising ethics; Acts honestly and realistically, in accordance with legal regulations and general morality. The company is free from any action that will harm the reputation of its name; avoids using statements or phrases that are disparaging about competitors or their products in announcements, proclamations and advertisements.

Regarding Responsibilities Towards Society and Humanity;

- Within the scope of Sustainability Strategy, aims to create sustainable value for stakeholders and acts to contribute to the goals of the Sustainable Development Goals. Contributes to society with activities and sustainable development strategy. Works by respecting human rights and the values of different societies, and is careful not to contradict the generally accepted lifestyle, worldview and traditions of the society in activities both in Türkiye and in other countries.
- Has signed the "Global Principles Agreement", an innovative corporate responsibility approach that proposes universal principles to create a common development culture in the constantly competitive business world, and basic universal principles are implemented within the company.
- Works to increase the education, culture, economy and social well-being of the societies in which it does business, avoids illegal employment and abuse of child workers, bad words and treatment towards workers, involuntary employment and all similar attitudes and behaviors contrary to human rights, and all suppliers and expects business partners to act in accordance with these issues, and terminates commercial relations with persons and institutions that are found not to have the necessary sensitivity in this regard.

- Does not include elements that are contrary to the basic values of the society, such as sexual abuse and violence, in advertisements, and avoids any symbols, expressions or insinuations that may lead the society to negative habits. Does not advertise in a manner that degrades any political view, religion, language or ethnic group.

Regarding Environmental Responsibilities;

- Considers social benefit and respects the environment in all activities. Complies 100% with relevant environmental legislation and standards and works to minimize environmental impact in line with sustainability strategy. The company cares about the protection of natural resources and acts with environmental awareness.
- Knowing that fulfilling responsibilities towards the environment also means fulfilling responsibilities towards employees, society and humanity, acts with environmental awareness during all services and activities and operates facilities at standards that will not cause environmental pollution.
- Within the scope of sustainable growth strategy, develops and implements ways and methods that will minimize the long-term negative environmental impacts of activities. Keeps natural resource consumption at a minimum level during all manufacturing processes, including the construction infrastructures of all its businesses, heating, cooling, electricity and water installations. Invests in energy efficiency to reduce carbon footprint.

Regarding Information Security and Social Media Responsibilities;

- Undertakes to comply with all legal regulations, legislation and items specified in ISO 27001 regarding information security and personal data. All data, text, images, sounds and similar contents in physical or digital media produced, used, transmitted, archived or legally transferred to the company during business processes is defined. The company's strategic information, organizational information, commercial, technical, financial data, customer dealer information, policy, procedure, regulations, product, service information, employee personal information and all other information, but not limited to these, are evaluated within this scope.
- Regarding information security, obliged to comply with the working and service conditions stated in the "Acceptable Use Policy" and "Employee Data Security Commitment" in all transactions and studies in the electronic environment.

- Any business-related and non-public information within the company has the status of confidential information, and this information is not shared with third parties outside the company, except for the requirements of the current task. While transparency is the main principle within the company, care is taken to share information to the extent required by the current task.
- All information developed by company employees, acquired by the company or revealed within the scope of work requirements belongs to the company and is considered a trade secret. All kinds of data that are not shared with the public, such as the company's products and services, financial information, technical information, business development information, information about customers and suppliers, information about employees, and similar data in written and printed form, in electronic media or in computer programs, belong to the institution and are considered confidential information.
- Keeps employees' personal information in full confidentiality. Only authorized persons have access to this information and use this information in accordance with the principle of confidentiality.
- Takes utmost care in the use and protection of personal information, including but not limited to the "Personal Data Protection Law".
- All employees are responsible within the scope of their individual duties for the healthy operation of the information security systems established to protect confidential information within the company. Company employees take due care to ensure that any information and/or documents they use and access while performing their duties are not lost and, in addition, the accuracy or integrity of such information and/or documents is not compromised.
- Company employees know that all information (financial information, customer information, personnel information, etc.) and/or documents they access due to their duties are confidential and they do not share them with third parties (persons outside the Company). They act in accordance with personnel loyalty principles, confidentiality principles and non-competition principles.

- Social media is widely used in the Company within the framework of promoting communication opportunities and the necessity of business life. Social media or internet services are primarily available for business use and to a limited extent for personal use. Employees are aware that all information accessed and sent electronically is monitored and controlled by the company. Protecting the passwords used for internet access and e-mail services is responsibility of employees.
- In addition to the general principles stated above regarding information security and the use of social media tools, some examples of situations can be stated as follows.

For information security, Employees,

- Must attach importance to the confidentiality of confidential and/or trade secret information and adhere to the principles of loyalty and confidentiality.
- Must protect the reputation of the institution by managing the risks of the processes.
- Report information security violations, security vulnerabilities and any suspicious situations within the institution to the relevant units and persons.
- Protect the confidential and private information of employees, customers, suppliers, business partners and other people and organizations working with and do not use this information for purposes other than business purposes.
- Do not share the information learned and documents obtained as part of their work with unauthorized persons or authorities within or outside the Company, and do not use them for personal purposes in any way.
- Even after leaving the Company, do not use the information and documents they have against the Company or in favor of competitors.
- Attach importance to the protection of intellectual property such as patents, trade secrets, copyrights, names and brands, etc.
- Do not forget that it is forbidden to leak any confidential information and/or documents within the scope of "Insider Trading" and to gain profit through the stock market or any other means.
- When some information needs to be shared with third parties due to business requirements, ensure that this information is shared in a way that will not harm the company (confidentiality agreement, etc.) by informing the information security / relevant unit and obtaining approval from the senior manager.
- Do not forget that the e-mail account provided by the company is allocated for company business and can be audited.
- Do not use the technological communication tools provided to employees for their individual purposes in order to exchange information within the business relationship.

- Avoid any behavior that may threaten the physical/environmental security of PCs, Laptops, Servers and similar information processing and production devices.
- Ensure that the sharing of information and documents requested by Regulatory Bodies and Independent Auditors is done accurately, understandably and on time, in accordance with company practices.
- Contact the information security unit in case of unauthorized/inadvertent access, exposure or sharing of confidential information for any reason.
- Individual visitors come at a reasonable frequency, and in these mandatory cases, meetings are held in the canteen, cafeteria or meeting room upon approval of the unit managers.
- Do not take any electronic and/or written documents (CD, portable memory, etc.) out of the company that contain information and data other than business purposes. (Administrator's approval is obtained when necessary.)
- Know that the authorization for installing software on the entire system is given by the Information Technologies Department, and they do not install or use programs that will allow files such as music, pictures, movies, etc. to be shared or downloaded on the internet.
- Do not send e-mails called "Chain Letter".
- Necessary attention and care must be taken in the use, sharing, storage, and protection of the accuracy and integrity of all kinds of information and documents. The published "Information Security Policy" document should be followed, and since the issues to be followed in this document are explained in detail, the relevant document should be obtained and read.

Regarding Relations with Suppliers and Customers;

- Company employees do not derive personal benefit from commercial transactions with suppliers and customers, do not use corporate information and positions for their own benefit, do not enter into commercial competition with the institution, and do not have close relationships with people or organizations that would benefit from the information they have as part of their job. With this manner, employees do not become owners or profit partners of a supplier or any competitor with which the company has a direct business relationship.
- Business relationships with organizations owned or profited by employee relatives, parallel business conditions are provided to similar suppliers/customers, that these conditions are met through periodic internal audit reports, and that the business relationship in question is expected to be completely outside the employee's individual scope of duty. However, even if all these conditions are met, the relevant company is required to provide the express consent of the General Manager.

- Employees must not have any financial interest relationship such as borrowing, lending, guarantee or similar with suppliers/customers and competitors, and their social relations with suppliers/customers must not be of an intensity that will damage professional business relationships and their personal transactions with suppliers must not be of a nature that will provide advantages beyond ordinary commercial terms.
- In principle, the company does not accept gifts from business partners. However, it is possible to accept gifts received from business partners (or given to business partners) if they comply with commercial practices and the Donation and Aid Policy, remain within the framework of good faith, and are not at a level that would affect the objectivity of their decisions. Hesitations that may arise on this issue can be resolved by taking into account the limits and rules determined in the Donation and Aid Policy.
- The company works to raise awareness of environmental, social and wider sustainability issues among the suppliers. Observes minimum environmental and social criteria when choosing the suppliers it will work with, and does not work with suppliers that are found to not meet certain human rights criteria.
- In addition to the general principles stated above for relations with suppliers and customers, some specific situations can be stated as follows.
 - Employees cannot use their duties and authorities in the institution for personal or private benefit, for the benefit of themselves, their families or third parties. Company's confidential and commercial information should not be shared with relatives or third parties.
 - Company makes donations upon the decision of the Board of Directors in order to support public beneficial activities such as education, health, culture and arts, law, scientific research, environmental protection, sports, reintegration of disabled people, entrepreneurship, technology and communication and to contribute to the future of the country.
 - Company; On the axis of corporate social responsibility and sustainability, but not limited to the above, taking into account the recommendations of the Sustainability Board, to individuals, non-governmental organizations, associations or foundations, universities, public institutions and organizations operating in the fields of education, culture, art, environment and sports, as per the Capital Markets Law. Aid and donations can be made within the framework of the principles specified in the regulations.
 - Employees creating environments where they can obtain financial benefits from third parties with whom they have business relationships is unacceptable. Employees should definitely avoid using their position to enter into business relationships with certain companies in order to gain personal benefits.

- In a case of an employee leaves the workplace and becomes a potential supplier, no commercial relationship can be established between him/her and the institution for two years, except with special permission from senior management. If the person leaves the job by becoming a partner of a supplier with whom he had a previous business relationship, existing commercial contracts are re-evaluated and action is taken in line with the opinion of the Ethics Committee.
- Employees do not request the employment of their relatives or acquaintances to any supplier company with which they have a business relationship due to their duties in the company.
- Employees can participate in activities organized by customers or institutions of which they are customers, provided that they remain within acceptable limits (within the knowledge of the company's senior management).
- Customers or suppliers may be allowed to pay for meals consumed during meetings where business matters are discussed and reviewed, or for other expenses consistent with business requirements.
- All donations and aid made upon the decision of the Company management are made in accordance with the Company's vision, mission and policies and by taking into account the Company's ethical principles and values. For this reason, donations and aid provided cannot disrupt the activities of the Company. In this process, ethical principles and values are prioritized and annual budget allocations are taken into account. Donations and aid can be made in two ways: in cash and in kind.

Regarding the Use of Institutional Resources;

- Company's movable and immovable properties, all kinds of material benefits obtained through company's means, human and information resources constitute the corporate resources. The interests of the institution are taken into account when using resources on behalf of the company. Company provides its employees with all necessary and appropriate resources to fulfill their professional responsibilities.
- Company resources (phone, e-mail, photocopy, vehicle, etc.) should not be used beyond reasonable limits for personal business. Employees acting with common sense is among the important responsibilities in using all kinds of company resources (computer, telephone, internet, fax, photocopy, company cash, vehicles, gasoline, office equipment, stationery, computer programs and software, etc.) efficiently while performing their duties. Workplace resources are provided to employees for 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.

- Employees are expected to use all vehicles, fixtures, goods and facilities allocated for their work, without damaging them, within the framework of their due diligence obligations and only for the institution. For example,
 - Long-term personal conversations made on a dedicated phone,
 - Excessive and unnecessary expenses during business travel,
 - Allocation of company staff's time to the manager's personal affairs,
 - Use of company vehicle for the benefit of third parties that cannot be directly associated with the institution,
 - Any behavior that prevents the use of common areas or damages fixed assets can be evaluated within this scope.
- In addition to these mechanisms, stakeholders can contact the Company at any time regarding any issue concerning the Company using the contact information below.

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