

## INFORMATION DISCLOSURE POLICY

### 1. PURPOSE

The primary objective of the Information Disclosure Policy of Çelik Halat ve Tel Sanayii A.Ş. ("Çelik Halat" or "the Company") is to provide shareholders and stakeholders with fair, timely, accurate, complete, understandable, analyzable, and easily accessible information regarding the Company's historical performance and future expectations.

### 2. SCOPE

The policy has been established by the Board of Directors in accordance with the Turkish Commercial Code ("TCC"), Capital Markets Legislation, and the regulations of the Capital Markets Board ("CMB") and Borsa Istanbul A.Ş. ("BIST"), based on the CMB Corporate Governance Principles. The Information Disclosure Policy governs the principles of written and verbal communication between Çelik Halat and all affiliated companies under its umbrella, including employees, consultants, regulatory authorities, customers, suppliers, creditors, investors, unions, various non-governmental organizations, potential investors, analysts (collectively referred to as "stakeholders"), and shareholders.

### 3. PUBLIC DISCLOSURE METHODS AND TOOLS

Subject to the provisions of the Capital Markets Legislation and the TCC, the primary public disclosure methods and tools used by Çelik Halat are as follows:

- ❖ Special circumstance disclosures submitted to Borsa Istanbul A.Ş. ("BIST") and the Public Disclosure Platform ("KAP"),
- ❖ Periodic financial reports submitted to BIST and KAP,
- ❖ Announcements such as prospectuses, circulars, general assembly invitations, and CMB-approved notices published via the Turkish Trade Registry Gazette and daily newspapers,
- ❖ Press releases issued through written and visual media,
- ❖ Disclosures made to data distribution organizations,
- ❖ Meetings, teleconferences, or one-on-one discussions with shareholders, potential and current investors, analysts, and capital markets participants (collectively referred to as "capital markets participants"), as well as informational and promotional documents prepared for them,
- ❖ The corporate website ([www.celikhalat.com.tr](http://www.celikhalat.com.tr)),
- ❖ Communication tools such as telephone, email, fax, and mobile phones (WAP and similar technologies).

### 4. PRINCIPLES FOR DISCLOSING SPECIAL CIRCUMSTANCES TO THE PUBLIC

#### a. SPECIAL CIRCUMSTANCES

Special circumstance disclosures, consisting of continuous and insider information, are disclosed to the public in compliance with CMB regulations. These disclosures are prepared in a manner that is timely, accurate, direct, understandable, sufficient, and free from misleading statements to assist decision-making by relevant individuals and organizations.

Special circumstance disclosures are not used for advertising, public relations, promoting company activities, or marketing capital market instruments. These disclosures are published on the Company's corporate website no later than the next business day after public disclosure and are retained for at least five years.

Special circumstance disclosures are submitted electronically to the KAP system with a digital signature, in accordance with BIST and CMB regulations.

#### b. AUTHORIZED PERSONS FOR DISCLOSING SPECIAL CIRCUMSTANCES

Special circumstance disclosures are prepared by or under the supervision of the shareholder relations unit. Such disclosures are made by Board members authorized by the Board of Directors and/or executives designated by the Board, whose names and titles have been publicly announced.

#### **c. POSTPONEMENT OF DISCLOSING INSIDER INFORMATION**

Çelik Halat may postpone the disclosure of insider information to prevent harm to legal rights and legitimate interests, provided that such postponement does not mislead the public and the confidentiality of the information can be maintained.

Once the reasons for postponement cease to exist, the insider information is disclosed to the public in accordance with CMB regulations, along with the reasons for the postponement. If the Company decides to postpone disclosure, it documents the measures taken to ensure confidentiality and the impact of the postponement on protecting legal rights.

#### **d. MEASURES TO ENSURE CONFIDENTIALITY OF INSIDER INFORMATION**

A list of individuals with regular access to insider information is maintained and updated as needed. These individuals are informed of their obligations under relevant laws and regulations regarding the misuse or improper dissemination of such information.

Unauthorized disclosure of insider information is considered a breach, and in such cases, the information is disclosed to the public via a special circumstance announcement. Disclosure to legally bound professionals (e.g., lawyers, auditors, tax consultants) is not considered unauthorized if necessary for their duties.

In cases of unintentional disclosure, an immediate announcement is made. During events like press conferences or investor meetings, disclosures are made public simultaneously or promptly.

Employees are trained on CMB regulations regarding insider information and are required to act responsibly to maintain confidentiality. Access to information is restricted based on job roles.

#### **e. STATEMENTS REGARDING NEWS AND RUMORS**

The Company monitors daily news and rumors through media research firms and relevant departments. If news or rumors could influence investor decisions or the value of capital market instruments, the Company issues a statement clarifying their accuracy or sufficiency.

If the news or rumors relate to postponed insider information, the Company decides whether to continue postponing disclosure. No special circumstance announcement is made if the information has already been publicly disclosed.

If requested by the CMB, BIST, or KAP, the Company provides disclosures as required.

### **5. EXERCISE OF SHAREHOLDER RIGHTS**

The finalization of the matters listed below regarding the exercise of shareholder rights is subject to the decision of the Company's Board of Directors. If the Board of Directors resolves on the following matters, these shall be disclosed to the public through a special circumstance announcement and by publishing them on the corporate website, the Turkish Trade Registry Gazette, and daily national newspapers:

- ❖ **General Assembly Meeting:** Date, time, location, agenda items, participation procedures, obligations to be fulfilled by those wishing to attend or vote by proxy, the handling of off-agenda matters, inability to convene the general assembly, total number of shares and voting rights, and information on how the right to participate in the general assembly may be exercised.
- ❖ **Corporate Actions:** Announcements regarding dividend distribution, new share issuances, allocation in capital increases, exercise of pre-emptive rights, cancellation of increased shares, mergers, spin-offs, and exchange transactions where applicable.

### **6. DISCLOSURE OF FINANCIAL STATEMENTS**

Çelik Halat prepares quarterly consolidated financial statements in accordance with International Financial Reporting Standards (“IFRS”) and discloses them via KAP. These statements are subject to limited review for six-month periods ending on June 30 and independent audit for annual periods ending on December 31, in compliance with Turkish Accounting Standards (“TAS”) and Turkish Financial Reporting Standards (“TFRS”).

The consolidated financial statements are approved by the Board of Directors, signed by responsible executives, and submitted to KAP within CMB-specified timelines. They are also published on the corporate website and retained for five years. Confidentiality is maintained during preparation.

## **7. DISCLOSURE OF ACTIVITY REPORTS**

The Activity Report is prepared in line with Capital Markets Legislation and CMB Corporate Governance Principles, approved by the Board of Directors, and submitted to KAP alongside financial statements. It is published on the corporate website and retained for five years. Printed copies are available upon request.

## **8. DISCLOSURE OF EXPECTATIONS**

The Company may disclose expectations in writing, including potential risks and uncertainties. Oral disclosures are made only in pre-scheduled meetings by authorized personnel, with reference to publicly available documents.

Forward-looking statements are accompanied by supporting data and avoid exaggerated or misleading projections. If expectations change, revised information is promptly disclosed.

## **9. COMMUNICATION WITH SHAREHOLDERS AND STAKEHOLDERS**

The Investor Relations Department is responsible for the regular management of relations with shareholders. The Investor Relations Department shares all information about the Company that has been previously made public with all shareholders by treating them equally.

Shareholders and stakeholders, as well as authorized persons within the scope of the information policy, can communicate. Our employees, other than these persons, cannot respond to questions and information requests coming from outside the Company.

Çelik Halat, in the meetings and informations it will hold with shareholders and stakeholders, Dec. and annual it does not provide guidance about the results of activities. Critical issues affecting the results of operations, strategic important elements that provide a better understanding of their approach and the sector and the environment in which they operate are capital transfers the market to its participants.

Presentations, information meetings, press conferences, teleconferences and speeches are possible and are announced to the public as much as possible in advance. The presentations and/or explanatory information notes prepared for these meetings are provided simultaneously with these meetings in order to ensure that all shareholders have access to the relevant documents at the same time. it is published on the Company's website.

Press conferences and statements will be made by the managers authorized to make statements on behalf of the Company.

Çelik Halat is the property of the company that prepares the analyst reports prepared about him, the analyst report he accepts it as such. Does not review, verify, approve analyst reports or revenue models, he doesn't take responsibility. On the contrary, in certain specific and limited cases and upon request, the public is wrong In order to prevent disclosure, only publicly disclosed and historical information should be used, and analyst reports can be reviewed, provided that they are limited to a specific subject.

## **10. PERSONS WITH ADMINISTRATIVE RESPONSIBILITY**

Under Capital Markets Legislation, individuals with administrative responsibility include:

- ❖ Members of the Company’s management or supervisory bodies,

- ❖ Non-members with regular access to insider information and decision-making authority over the Company's future.

Transactions involving Company shares or related instruments by these individuals or their close associates must be reported to KAP.

#### **11. CORPORATE WEBSITE**

The Company's corporate website is [www.celikhalat.com.tr](http://www.celikhalat.com.tr). Information on the site complies with CMB regulations and Corporate Governance Principles, with key content available in Turkish and English. All public disclosures are accessible on the website in a timely manner.