

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

1 Kaptan Evaluation

Founded in 1964 with the establishment of its first rolling mill in Karabük, our company began its journey in the iron and steel industry. Today, we continue to grow and strengthen our position in the sector through successful operations spanning diverse industries, including iron and steel, port management, transportation, energy, mining, recycling, and shipbuilding. As the first and only steel plant in the Thrace Region, we are proud to contribute to the region's industrial development.

Located in Marmara Ereğlisi, our steel plant, rolling mill, and oxygen production facilities operate in compliance with international quality standards. The strategic proximity of our facilities to the main road and Martaş Port provides a significant logistical advantage. Since 2002, our steel plant has maintained an annual production capacity of 1,400,000 tons of billets. Additionally, since 2003, we have been producing gaseous oxygen, liquid oxygen, and liquid argon, supplying the surplus to the market and supporting the industry's needs.

Our Marmara Ereğlisi Rolling Mill is fully integrated with our steel plant, boasting an annual production capacity of 1,000,000 tons.

With a focus on diversifying our product range and manufacturing high-value-added products, our company has made significant investments. In 2023, we commissioned new facilities, including the Wire Rod Mill (WRM), Special Bar Quality Mill (SBQ Mill), and the Wire Rod Rolling Mill, with a combined annual production capacity of 550,000 tons. These facilities are capable of producing high-quality carbon and special steel products in dimensions ranging from 2.5 mm to 26 mm. The Wire Rod Mill, in particular, offers production options ranging from 4.5-26 mm in smooth products and 6-20 mm in ribbed rods. In 2025, the bar production process at the Wire Rod Rolling Mill was commissioned.

With over 60 years of institutional culture, we have upheld a commitment to respecting people, the environment, and our work. We continuously strive to utilize our resources and technological capabilities to contribute to the national economy. Recognizing the importance of occupational health and safety as well as environmental responsibility, we have implemented an Integrated Management System. This system emphasizes quality, occupational health and safety, environmental protection, and sustainability, aligning with the highest standards while fostering a unified approach across all operational units.

Our company ranks among Turkey's 500 Largest Industrial Enterprises and continues to solidify its leadership position with an innovative and forward-thinking identity. Beyond achieving industrial success, we prioritize creating value for society. We remain committed to collaborating with our stakeholders to build a sustainable future and leave a better world for generations to come.

Our scope of management system;

- TS EN ISO 9001: Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. – Head Office and Marmaraereğlisi Plant
- TS EN ISO 14001, TS EN ISO 45001: Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. – Marmaraereğlisi Plant
- Sustainability Management System: Kaptan Demir Çelik Endüstrisi ve Ticaret A.Ş. – Marmaraereğlisi Plant

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

2 Global Assessment of Integrated Management Systems:

Quality management system: In today's conditions, the great developments in the field of information, technology and communication are driving the societies into a rivalry competition and an economic race in which new developments are taking place day by day. The globalization of world trade has expanded the scope and boundaries of competition and the number of participants has increased. Moreover, the participants of this race are getting more qualified every day. Customers have become more conscious, more informed and customer expectations have reached the highest level. It is no longer sufficient to meet the expectations of the customers, it is necessary to go beyond the expectations of the customers. The pace of change has increased, and developments in the field of technology have enabled applications that could not have been imagined before.

The survival of businesses can only be achieved by providing goods or services in all sectors that meet customer needs and expectations. For this reason, the implementation of the Quality Management System, which encompasses all stages from design to production, marketing and after-sales services and aims for continuous improvement, is an essential condition in organizations.

The ISO 9001 Standard is not directly related to product and service quality, but to the quality of the management system. If an effective Quality Management System is established and implemented, quality products and services will be produced to meet customer needs.

Occupational Health and Safety Management System: Occupational Health and Safety is one of the most important topics of sustainable development. According to the statistics of the Social Security Institution, thousands of accidents and injuries occur every year in all sectors, especially metal, mining and construction. ISO 45001 is recognized as the most common standard worldwide for a structural approach to OHS management systems.

Raising the awareness of occupational safety, controlling risks, creating a healthy and safe working environment, defining the conditions that must be fulfilled in order to prevent occupational accidents and diseases are indicative of the value they attach to the human being, which is the most important value of corporations.

Environment and Sustainability Management Systems: “Environmental Protection” and Sustainable Development ”are among the most important issues for the industry. The environment is not only an environment in which people live and provides resources for their survival, but also an economic resource for businesses. Production is carried out with the resources obtained from the environment. In this case, the depletion of resources and pollution of the environment means the deterioration of public health as well as the lack of new resources for enterprises. The solution of environmental problems depends largely on the adoption of an environmentally friendly approach. Environmental Management is not just a control system; The company also has functions that respond to the company's environmental responsibilities and at the same time reduce risks and increase market opportunities. In the activity reports of many companies, it is stated that environmental management system brings economic success as well as environmental protection.

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

One of the most important expense items of the steel industry, which has many inputs, is energy use. Energy Efficiency not only reduces production costs, but also reduces greenhouse gas emissions.

Efficient use of energy, water and other raw material resources in production will reduce costs in enterprises, especially in small and medium-sized enterprises, and ensure the more sensitive use of environmental resources. Consumers today demand that the products and services they buy produce less waste, generate more recycling, and demand greater use of renewable resources and safer products for the ecosystem. In order to avoid lagging behind the changes, enterprises have to take these demands into consideration in strategic decisions and develop a more environmentally sensitive management approach.

Greenhouse gas monitoring plans, carbon dioxide density (tonne CO₂ / tonne crude steel), which is the parameter of Environmental Performance monitoring, We are monitoring through three different systems; 1) The Ministry of Environment and Urbanization, 2) UK Cares and 3) Worldsteel. We regularly calculate the kgCO₂ equivalent and report it to the relevant organizations.

Steel producers are no longer merely manufacturing companies; they have become key actors in global climate targets and sustainable development visions. Developments such as the European Union Green Deal, the Carbon Border Adjustment Mechanism (CBAM), Türkiye's ratification of the Paris Agreement, and the 2053 Net Zero Emission target compel businesses to reduce their carbon footprint and to make investments focused on green transformation.

We act with this awareness and base our sustainable production strategies on a future scenario focused on emission reduction and energy efficiency. Within the scope of our Net Zero Emission Roadmap, our priority is to invest in process and energy efficiency improvements while transitioning to renewable energy sources. In this context, our solar power plant projects with a total capacity of 72.6 MWp are ongoing in the provinces of Van, Adana, Mersin, and Uşak. These investments are being carried out simultaneously, and we anticipate that they will contribute both to energy independence and to achieving carbon reduction targets.

In the long term, we have also initiated feasibility studies on carbon capture, storage/utilization (CCS/CCU) and green hydrogen technologies. However, since the integration of these technologies into the sector will take time, we are initially moving forward with the most feasible and measurable projects.

One of the first field applications of this strategy is the waste heat recovery system project, which aims to convert the waste heat from the annealing furnace into energy. Currently at the feasibility stage, this project plan has been comprehensively evaluated with detailed engineering calculations, energy savings and carbon reduction potential, financial return analyses, as well as all available incentive and credit mechanisms.

Climate Regulations and Targets: Comply with international regulations such as the Paris Agreement and the European Green Deal. In line with the goal of limiting global warming to 1.5°C, reduce emissions by 15% by 2030, 50% by 2040, and achieve near-zero emissions by 2053.

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

It is advocated and actively supported that Türkiye establish an Emissions Trading System (ETS) aligned with the European Union, ensure carbon prices are close to EU levels, and direct carbon payments as financing for sustainable transformation projects.

The main ones of our sub-goals that we set to achieve our long-term goals and that will feed our main goals,

- Implementing measures to prevent losses and leaks throughout our processes.
- Revising combustion chambers.
- Modernizing and incorporating heat recovery in production lines.
- Investing in Consteel technology to preheat scrap.
- Generating electricity from waste heat using ORC units or steam turbines.
- Reducing electricity and energy consumption.
- Cutting down natural gas consumption.
- Investing in renewable energy sources, including solar and wind projects.
- Initiating the scrap shear project to enhance scrap efficiency.
- Adopting turbo compressors as part of our energy efficiency program.
- Installing high-efficiency fans with specialized blade structures.
- Implementing electric alternatives for internal combustion engine vehicles to achieve significant energy and cost savings.

Our sustainability goals are detailed in the EYS-FR-250 document as annual targets and are communicated to all our stakeholders on our website together with our sustainability performance data. ([Link](#))

Our sustainability targets:

- Characteristics / criteria appropriate to the entire supply chain, inclusiveness, integrity, governance and transparency and ethical business practices shall be considered
- To ensure that the highest quality, environmental and health and safety standards required to satisfy end-users are met, ensuring and maintaining quality, environmental and health and safety management systems requirements.
- To comply with legal requirements and standards,
- To ensure consistent compliance with the policies,
- To ensure the quality and sustainability of our products,
- Effective management of all waste streams and minimizing wastes thrown into the landfill,
- To minimize pollution and emissions related to production and transportation,
- On-site protection and development of the natural environment related or affected by structural steel production,
- Using energy more efficiently and reducing “global warming potential / carbon footprint”,
- To promote the more efficient use of base materials and the recyclability of structural steel products,
- To minimize the use and demand of more efficient water in main water resources.
- Respect internationally accepted norms and standards on human rights and labor conditions,

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- m) To actively participate with local communities and other stakeholders to understand risks and opportunities,
- n) To ensure sustainable economic growth, ethical business practices and good corporate management in the structural steel supply chain,
- o) To assist the development of responsible resources in the construction steel supply chain by providing a means to evaluate and improve the sustainability performance of our suppliers,
- p) Ensuring that performance is measured, reported and improved on sustainability issues,

Strategies

Sustainable Production: Implement clean production technologies and processes to reduce the carbon footprint. Offer customers low-carbon and environmentally friendly products. Raise awareness among all stakeholders on carbon reduction and sustainability. Support stakeholders in implementing their policies on these matters.

Leverage incentive programs for Green Transformation and Digital Transformation, as well as renewable energy investments, utilizing national and international financing sources. As part of the sustainability transition, participate in the Green Deal Compliance Project Responsible Program supported by the Republic of Türkiye Ministry of Trade.

- a. To win new customers,
- b. To increase customer satisfaction and loyalty,
- c. Manage to quickly handle product orders,
- d. To increase the market share in the domestic market and exports,
- e. To increase employee satisfaction,
- f. Improving company image,
- g. Increasing the share of product groups with high added value in total production,
- h. Developing export markets in terms of quantity and diversity,
- i. To reduce the share of Scrap and Energy in total cost,
- j. To improve the quality level in all product groups and to increase customer satisfaction,
- k. Developing cooperation with suppliers, improving all kinds of input materials and service quality,
- l. To ensure the active participation of our employees in the processes at all levels, to make them a continuous development, an effective and institutional feature,
- m. To increase training and support activities to improve the personal and organizational skills of our employees,

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- n. To try to minimize and completely eliminate the negative physical impacts that our organizations reflect on the environment as a matter of activity, with the common attention, effort and improvement efforts of all our employees,
- o. To work with authorized institutions and organizations accredited in the sector.
- p. To ensure efficient and efficient use of resources
- q. Creating an effective human resources system
- r. To benefit from information technologies at the highest level, To increase the use of technology
- s. To increase the efficiency of the communication system
- t. To make service processes effective and efficient
- u. To increase the knowledge of external stakeholders about the activities and activities of the organization
- v. To have an effective and sufficient computing infrastructure
- w. To increase the knowledge and skills of employees
- x. Providing maximum benefit from employees
- y. To involve all stakeholders in the processes and increase the satisfaction rate
- z. To increase strategic planning and performance awareness at every level of the organization

3 Internal and External Issues

Our internal issues;

- Management, organizational structure, job descriptions, and responsibilities
- Kaptan's general policy, objectives, strategies, corporate vision, and mission
- Resources and knowledge base (capital, time, personnel, processes, systems)
- Employees' awareness of management systems
- Employees' interest, effort, and awareness regarding work
- Employees' awareness of OHS, environmental, and energy efficiency issues
- Relations with internal stakeholders, their perceptions, and values
- Kaptan's corporate culture and institutional memory
- Employee loyalty and commitment
- Risk and opportunity analyses and actions related to all management system processes
- Facility infrastructure and adequacy of production equipment
- Information flow and decision-making processes

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayım Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- Information flow and decision-making processes; Technical, Commercial, Financial Executive and OHS Committees
- Ethics Committee, reporting, monitoring and resolution of ethics violations
- Standards and sectoral guidelines applied by the organization
- Statistical and reliable data obtained from Management Review (YGG)
- Efficiency and reliability of production processes
- Ensuring compliance of products with standards and specifications
- Stakeholder satisfaction, evaluation, and resolution of feedback
- Customer technical visits
- Financial structure/budget (management of financial resources, income and expenditure, and effective management of organizational finances)
- Strategic impact of financial policies, cost management and efficiency, communication of financial strategies, and management of financial risks
- Proper application of internal financial processes, collaboration with independent audit firms for budget and financial audits
- Accuracy, security, and preservation of financial and fiscal records
- Financial and fiscal performance analysis
- Financial evaluation of investment projects
- Determination of annual budget process and objectives, budget applications, and regular monitoring, operation of external audit mechanisms for budget management
- Arrangement of financial terms in contracts and agreements with suppliers
- Defining and applying internal legal processes, collaboration with external law firms for consultancy
- Legal compliance in information security policies and procedures
- Preservation of information and documents used in legal processes
- Development of preparedness plans for legal incidents
- Corporate knowledge base and capabilities
- Ethical values (no personal benefit, honesty, integrity, transparency, confidentiality, conflict of interest, fair competition, time management, external work, non-discrimination, brand protection, accountability)
- Contribution to society and social responsibility
- Competition and marketing ethics
- Reporting, monitoring, and resolution of ethical violations
- Protection of Kaptan's intellectual property rights
- Confidentiality, integrity, and accessibility of Kaptan's data
- Protection and processing of personal data
- Business continuity management and emergency planning
- Internal confidentiality policies and procedures
- Waste management and recycling processes, zero waste culture
- Monitoring and reduction of emissions

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- Monitoring and analysis of workplace accidents and injuries
- Management of OHS training and processes
- Creation of emergency plans and response teams
- Radiation (direct or indirect exposure, disposal of radioactive materials)
- Administrative sanctions and penalties
- Workplace order and ergonomic measures
- Arrangements related to those nearing retirement age
- Strategic analysis for human rights (business policies and procedures, work culture, training and awareness, reporting mechanisms, business processes, and supply chain management)
- Human rights expectations of stakeholders (employees, customers, community, investors and shareholders, NGOs, government, and regulatory bodies)
- Increase in market share (expanding customer portfolio with the establishment of a new wire rod production facility)
- Transition to high value-added production, profitability
- Development of technological capabilities
- Evaluation of competitor firms (evaluation of competitors with better performance in climate change issues, monitoring of technological innovations)
- Implementation of IATF 16949 automotive quality management system, document revisions
- Customer-specific requirements
- Relocation of the Misinli Rolling Mill to the end section of the Wire rod Rolling Mill.
- Establishment of a bar production process at the Wire rod Rolling Mill.
- Inclusion/expansion of document scope to cover the wire rod rolling mill
- Level 1-2 digitization, continuation of Level 3 studies
- Planning of sustainability reporting processes within the company, and establishment of data collection and reporting infrastructure.
- Assessment of the organization's activities in accordance with the EU Taxonomy criteria and planning of sustainable investment decisions accordingly.
- Establishment and implementation of internal policies and procedures related to sustainability, environmental management, and carbon management.
- Obligation to establish the ISO 46001 Water Efficiency Management System.
- Due to the conflict between Iran, Israel, and the USA in the Middle East, energy and production costs have increased, scrap and other raw material prices have risen, and delays in logistics and supply chain processes have become a significant risk.

External issues;

- International, national, regional, or local social, cultural, political, legal, regulatory, financial, technological, economic, natural, and competitive environments
- Developments and trends in the industry that impact the organization's objectives

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- National political and governmental events
- Certification requirements
- Customers, competition, and regional conditions
- Customer expectations and specific demands
- Stakeholder satisfaction measurements and complaints
- Competitors and producing higher-quality products compared to them
- Financial security (insurance for critical production and equipment losses during extraordinary events like floods or disasters, maintaining cash flow, balanced production distribution for customer diversity)
- Legal and other requirements (national and international standards, environment, occupational safety, energy, labor legislation, laws under the Ministry of Science, Industry, and Technology, demands of NGOs, customs and export regulations)
- Supply chain (raw material prices, alternative suppliers, sustainability of logistical support, maintaining the existence of current suppliers, supplier contract terms)
- Technological advancements (fairs, seminar visits, collaboration with firms producing/importing new technologies, cooperation with universities and technology-oriented NGOs)
- News in the press and media
- Exchange rate fluctuations
- Threats to the country's governance
- Possibility of war, terrorist attacks, coup attempts, and embargoes
- Location and geographical position
- Natural disasters (earthquakes, floods, storms, etc.)
- Loans, grants, and financial aids
- Economic conditions (financial and fiscal planning considering political and economic developments in the country, such as interest rates, foreign exchange, export, and import policies)
- Stakeholders' commitment to OHS and environmental issues (requiring ISO 45001-14001-9001 certifications from suppliers, monitoring and enforcing predetermined OHS and environmental standards for stakeholders working on-site)
- R&D efforts to develop products and services that reduce negative environmental impacts (consultants, R&D centers, technoparks, university projects, etc.)
- Traffic congestion impact on the supply chain
- Climate change (decreasing water resources, extreme weather events such as floods, hurricanes, hailstorms, material damage, the need for carbon emission reduction, compliance with new regulatory frameworks such as Product Circularity, Border Carbon Adjustment Mechanism, Paris Agreement)
- Water and air quality (water usage permits, ensuring sustainable water supply, legal compliance, monitoring, and verifying greenhouse gas emissions)
- Land use and existing pollution
- Availability of natural resources (regular monitoring of consumption, optimizing processes to minimize resource usage, employee awareness programs)
- Biodiversity (preservation of ecological balance and impacts on biological diversity)
- Stakeholders' ethical expectations (honesty, integrity, transparency, confidentiality, brand protection, fairness, and social responsibility)

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- Strategic analysis for human rights (government and regulatory bodies, international standards and agreements, societal and political pressures, industry trends)
- Human rights expectations of stakeholders (international organizations and activists, customers and consumer groups, investors and shareholders, media and public opinion, competition and business partners)
- Performance of raw material suppliers
- Raw material price fluctuations
- Establishment of a national Emissions Trading System in Turkey based on EU ETS, regulatory compliance, cost impact, competitive advantage
- Population growth (increased energy demand linked to population growth in Kaptan's operating region, and its role in energy consumption and environmental impacts)
- Changes in energy policies (impacts of changes in national and local energy policies on Kaptan's energy management, evaluation of their effects on energy consumption and renewable energy usage)
- Local conditions and socioeconomic factors (adopting necessary measures for energy consumption and management considering local conditions and socioeconomic status in Kaptan's operating region, evaluating their role in energy consumption and environmental impacts)
- Urbanization and deforestation (developing strategies considering urbanization rates and deforestation's effects on energy demand and environmental impacts, analyzing their implications for energy management)
- Supply chain risks due to extreme weather events (delays/cancellations in supply processes caused by natural disasters like storms, floods, fires, and droughts)
- Changing consumer preferences (increased demand for sustainable products and services, reflecting this in corporate strategies)
- Potential impacts of climate change on products, services, production processes, and associated OHS (personal protective equipment, disaster plans/precautions, drills adapted to changing disaster types, etc.)
- Radiation (dispersion of dust contaminated with radiation, disposal transportation for radioactive materials)
- Reporting obligations for companies within the scope of the Turkish Sustainability Reporting Standards (TSRS).
- Legislation aimed at promoting environmentally labelled products and services under the Türkiye Environmental Label System.
- Requirements for the reporting and verification of carbon emissions under the European Union Carbon Border Adjustment Mechanism (CBAM).
- EU implementing regulations regarding emission calculation, verification, and certificate arrangements related to CBAM applications.
- Restrictions on the international shipment of waste under the European Union Waste Shipment Regulation.
- Obligations for companies to manage human rights and environmental impacts under the Corporate Sustainability Due Diligence Directive (CSDDD).
- Regulations on reporting sustainability performance under the Corporate Sustainability Reporting Directive (CSRD).

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- National legislative requirements regarding noise emissions in the environment caused by equipment used outdoors.
- Due to the ongoing conflict between Iran, Israel, and the USA in the Middle East, regional geopolitical risks have increased, oil and natural gas prices have risen, global economic uncertainty and inflation risks have emerged, international trade sanctions and security risks have intensified, and disruptions in the Strait of Hormuz and regional trade routes have occurred, resulting in adverse impacts on energy costs, supply chain operations, and global demand in the iron and steel sector.

4 Internal and External Stakeholders

Kaptan identified its key stakeholders and published this information publicly at <http://kaptangrupturkiye.com/en/> . All of our stakeholders can submit all their suggestions, complaints and requests related to our products and services through the contact information provided at this address, and their satisfaction status through Stakeholder satisfaction surveys.



Reference :

KDÇ Stakeholders (EYS-TB-090)

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

External Stakeholders:

- Regulatory Authority:

Kaptan has identified the public institutions and organizations relevant to its sector, operating under the framework of the Turkish Commercial Code and the Constitution of the Republic of Turkey, within the KDC Stakeholders (EYS-TB-090) table. The processes conducted for circumstances tied to specific articles in the laws are detailed in the List of Legal Legislations to be Complied (EYS-FR-400).

Reference :

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110),
KDC Stakeholders (EYS-TB-090)
List of Legal Legislations to be Complied (EYS-FR-400)

- Customers:

Based on customer needs and expectations;

At Kaptan, order and proposal preparation processes related to the sales process are carried out with ERP program integrated with production and stock systems. The company has quality and customer satisfaction management systems that aim to meet the requirements of the sector and provide the best service to its customers. Our facilities, which have ISO and many other international certificates, provide the most appropriate services for our customers without compromising information security, business continuity, customer satisfaction, environment, energy, occupational health and safety.

For orders of iron products carried out with customers, the export and domestic market departments receive (ERP contracts) and (Domestic Market Proposal Form) through the ERP and provide them to sign the terms and demand the conditions in these contracts. The sale of other by-products such as waste, oxygen, flue dust, scale, and scrap materials is again carried out through the ERP system due to the restrictions imposed by the shipping process. The sales carried out with the companies on these sales are made through the information system via mail system. At Kaptan, finished stock and cost information is not shared with customers.

The scope of communication covers the issues such as requirements, demands, complaints, satisfaction, information / information about the offer / job request / contract, feedback, and bilateral. The method of communicating with stakeholders and prioritizing sustainability aspects was established to give priority to stakeholder expectations and concerns.

Customer feedback is obtained through surveys, customer visits, complaints, and similar channels. Customer satisfaction is evaluated in accordance with the Export Customer Satisfaction Evaluation Procedure (iHR-PR-020) and the Domestic Market Customer Satisfaction Evaluation Procedure (ST-PR-020). Requests, complaints, and suggestions from our customers are managed in accordance with the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110). These evaluations are monitored and managed by the Integrated Management Representative.

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

References:

KDC Stakeholders (EYS-TB-090)
Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110),
Export Sales Procedure (IHR-PR-010)
Export Customer Satisfaction Evaluation Procedure (IHR-PR-020)
Export Registered Purchase Sale Shipment Procedure (İHR-PR-030)
Domestic Market Finished and Semi-finished Goods Sales Procedure (ST-PR-010)
Domestic Market Customer Satisfaction Evaluation Procedure (ST-PR-020)

- Suppliers:

Our company acts in accordance with the procurement procedures specified in the IMS as required by the Quality Management system in the procurement processes it conducts. Apart from this procedure, confidentiality agreements are made with the private sector institutions (banks, consultancy firms), depending on the subject of information security and information retention. Contracts with banks regarding the transfer of information are followed by the finance department, whereas the contracts of the consultancy institutions receiving services are kept by the procurement department or the department's representative. Captain reserves the price and special agreement information and purchase amounts of domestic and foreign suppliers within the scope of ISMS and asks to keep this information.

Major procurement (goods or services) contracts include Occupational Health and Safety requirements, in which the risks and aspects related to the activity to be made are specified and in line with company policies and procedures. Suppliers are assessed to meet human rights, ethical business practices, health, safety and environmental standards. There are articles stating this matter in our import contracts and domestic purchase order forms. By reviewing the agreements made, necessary work is carried out to ensure compliance with these articles for those possible.

The management of our suppliers' requests, complaints and suggestions is evaluated according to the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110) and these evaluations are monitored and managed by the Integrated Management Representative.

References:

KDC Stakeholders (EYS-TB-090)
Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)
Subcontractor (Subcontractor) Working Procedure (EYS-PR-170)
Supplier Sustainability and Risk Analysis and Mapping Procedure (EYS-PR-270)
Technical, Business, Logistics, Purchasing General Procedure (SA-PR-010)
Foreign Raw Material Purchasing Procedure (İTH-PR-010)
Candidate Supplier Identification and Evaluation Procedure (İTH-PR-020)
Surveillance Company Identification and Evaluation Procedure (İTH-PR-030)

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- Certification Bodies:

Interactions with external audits and field inspections (certificates, products, etc.) or mutual visits, seminars, congresses or fairs are conducted during the year. Requests and expectations are taken orally or in writing.

The management of Certification Bodies requests, complaints and suggestions is evaluated according to the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110) and these evaluations are monitored and managed by the Integrated Management Representative.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

- Communities:

Kaptan defines the region in which it operates as 'communities', and in this context, includes the local people, the local business world and the stakeholders who will be indirectly affected by the hazards due to the location and affect the Kaptan. The local community closest to the facility is an important stakeholder in terms of environmental impacts, employment opportunities and impacts on social life. Collaborations with the local business world include effects such as economic development and employment increase.

The management of community demands, complaints and suggestions is evaluated according to the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110) and these evaluations are monitored and managed by the Integrated Management Representative.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

- Neighbors:

Neighbors as stakeholders include adjacent lands that may be affected by hazards. On the other hand, in order to avoid being affected by dangers, harmful or polluting substances should not be released into the air, water and soil, legal norms regarding noise pollution should be complied with and environmental sensitivity should be prioritized. Neighbors' requests, complaints and suggestions are received verbally or in writing.

The management of our neighbors' requests, complaints and suggestions is evaluated according to the Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110) and these evaluations are monitored and managed by the Integrated Management Representative.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

- Competitors:

As stakeholders, competitors include other companies operating in the same industry and serving similar markets. It is essential to maintain a fair competitive environment in accordance with sectoral ethical principles. In this context, unfair practices that may harm the commercial activities of competitors should be avoided; information security, trade secrets, and intellectual property rights must be respected. Anti-competitive behaviors such as market manipulation, misleading statements, and predatory pricing should be strictly avoided. Cooperation that contributes to sectoral solidarity and mutual benefit should be encouraged. Feedback from competitors may be taken into consideration through sectoral meetings, association activities, and official platforms.

The management of our competitors' requests, complaints, and suggestions from our competitors is evaluated in accordance with the Stakeholder Request, Complaint, and Suggestion Management Procedure (EYS-PR-110), and these evaluations are monitored and managed by the Integrated Management Representative.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

Internal Stakeholders;

- Shareholders:

A review meeting is held to define the environmental, social and economic aspects of the activities, products and services that the Kaptan can control and influence, taking into account the life cycle perspective and stakeholder views.

All shareholders agree that the Company's information shall not be shared without permission from other shareholders and that the private information of the Company's employees shall be protected. The management representative was given full authority to the OHS committee for the determination of the environment and OHS openings that would affect the prestige of the company, and a request was made to fulfill the requirements.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

Management Review Meeting (EYS-FR-120)

- Employees and their families:

The personal information of the personnel which is required by the provisions of the constitution in the Kaptan is preserved and stored (there are relevant articles in the HR Procedures). The human resources dismissal procedure for those who act in contradiction may be initiated upon the instruction of the unit directors. Personnel health information is recorded and stored only for sharing with the relevant authorities. Human Resources employee welfare; Fair treatment of employees; recruitment, training, promotion, equal opportunities in job tasks, quitting; Freedom of association and compliance with employment

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

legislation. The requirements of the Ethics Trading Initiative (ETI) Basic Code and International Labor Organization (ILO) standards are taken into account during export and policy review.

By organizing social activities such as trainings, meetings, sporting events, motivational meals and entertainments, it interacts with employees and their families to meet their demands and expectations. It is aimed that employees value their work and gain appreciation in return for self-study.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

Employee Handbook (EYS-ÇEK-010)

- Students / Trainees:

The main purpose of the internship system applied in Kaptan University, High School, Technical High School, Industrial Vocational High School and so on.

The aim of the course is to provide the opportunity of internship to the students of the educational institutions who are obliged to do the internship, to monitor the performances of the students during the internship and to bring the superior performing students to the Kaptan family by providing job employment at the end of the education.

References:

KDC Stakeholders (EYS-TB-090)

Stakeholder Request, Complaint and Suggestion Management Procedure (EYS-PR-110)

Employee Handbook (EYS-ÇEK-010)

In order to measure the expectations of stakeholders, the [Stakeholder Expectations and Sustainability Prioritization Survey](#) was created and announced to all stakeholders on the website.

5 Stakeholders Needs and Expectations

References:

Stakeholders Needs And Expectations Table (EYS-TB-110)

6 Stakeholders Communication Platform and Frequency

References:

Communication Table With Our Stakeholders (EYS-TB-100)

7 Our Strategic Issues and Materiality Matrix in the Eyes of Our Stakeholders;

Kaptan, we aim to identify the expectations of our stakeholders, provide solutions that meet their needs, and ensure continuous improvement in line with the principles of sustainability

	STRATEGIC ANALYSIS AND EXPECTATIONS OF STAKEHOLDERS MANUAL	Doküman No	EYS-SAPB-0010
		Yayın Tarihi	1.01.2026
		Revizyon Tarihi	2.03.2026
		Revizyon No	1

and social responsibility. Accordingly, we actively use communication and feedback channels to maintain strong engagement with our stakeholders. This process contributes to achieving our goals of sustainable growth and social value creation more effectively. To systematize this engagement and transform feedback into measurable data, the EYS-FR-270 Stakeholder Expectations Assessment and Sustainability Priorities Determination Survey is implemented. The survey consists of separate question sets designed to evaluate the expectations of each stakeholder group and to identify sustainability priorities. Developed through the Microsoft Forms platform, the survey was converted into a QR code and shared via posters placed in designated areas and on announcement boards across the facilities. Stakeholders can access and complete the survey by scanning the QR code with their smartphones or by using the web link on their smartphones or computers.

The collected responses are automatically recorded in Microsoft Forms and subsequently exported in Excel format to be classified according to stakeholder groups. Based on the analyzed data, a Materiality Matrix is created, where the horizontal axis represents the “Significance for Kaptan Demir Çelik” and the vertical axis represents the “Significance for Stakeholders.” The finalized matrix is shared with all stakeholders through the company’s website and sustainability report.

Based on the regular feedback received from our stakeholders, the measured and prioritized expectations are evaluated, and the key priority topics identified within the scope of the materiality analysis are listed below.

	Material Aspect			Ability to influence (high/low)	Material Aspect			Ability to influence (high/low)			
Importance to Environment, Stakeholders and Society -----> more				High		Energy Use		High			
				High			Safe and Healthy Working Conditions	High			
				High	Waste Management	Emissions to Air	Water Use	High			
				High	Stable Employment	Gender Equality	Human Rights	High			
		Customer Satisfaction	Business Ethics and Ethical Conduct	High	Grievance Mechanism	Operational Efficiency		High			
		Equal Opportunity and Diversity	Community Relations	High	Circular Economy	Digitalization		High			
		Supply Chain Sustainability		High	Employee Engagement and Satisfaction	Use of Renewable Energy		High			
		Support for SMEs		High	Local Procurement			High			
				High				High			
				High				High			
<---- less	Strategic Investments			Low	Leadership			Low			
	Emergency Action and Preparedness			Low	Employee Relations			Low			
				Low				Low			
				Low				Low			
				Low				Low			
				Low				Low			
<---- less				Importance to Delivering Organisations Strategy				-----> more			

These results show that Kaptan D.Ç.'s corporate strategies are shaped in line with the needs of our stakeholders and social expectations. Our aim is to ensure the satisfaction of all our stakeholders and to support the sustainability of our business activities.

[illegible]