(CONVENIENCE TRANSLATION OF FINANCIAL STATEMENTS ORIGINALLY ISSUED IN TURKISH - SEE NOTE 36)

ISKENDERUN DEMİR VE ÇELİK A.Ş.

FINANCIAL STATEMENTS FOR THE PERIOD BETWEEN 1 JANUARY - 31 DECEMBER 2021 AND INDEPENDENT AUDITOR'S REPORT



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(CONVENIENCE TRANSLATION OF INDEPENDENT AUDITOR'S REPORT ORIGINALLY ISSUED IN TURKISH) INDEPENDENT AUDITOR'S REPORT

To the General Assembly of İskenderun Demir ve Çelik A.Ş.

A) Report on the Audit of the Financial Statements

1) Opinion

We have audited the financial statements of Iskenderun Demir ve Çelik A.Ş. ("the Company"), which comprise the statement of financial position as at 31 December 2021, and the statement of profit or loss, statement of other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as at 31 December 2021, and its financial performance and its cash flows for the year then ended in accordance with Turkish Financial Reporting Standards (TFRS).

2) Basis for Opinion

We conducted our audit in accordance with the standards on auditing issued by Capital Markets Board and the Standards on Independent Auditing ("SIA") which is a part of Turkish Auditing Standards published by the Public Oversight Accounting and Auditing Standards Authority ("POA"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics for Independent Auditors ("Code of Ethics") published by the POA, together with the ethical requirements that are relevant to our audit of the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

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3) Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Key Audit Matter

Revenue recognition

While conducting its assessments, the Company management takes into account the detailed conditions set out in TFRS 15 regarding the fulfilment of performance obligations and recognition of the transaction costs allocated to them as revenue, in particular whether the control of goods and services have passed to the customer.

The Company recognizes export revenue by analyzing whether the significant risks and rewards are transferred to the buyer according to the delivery arrangement types of export sales.

In this context, revenue recognition has been determined as one of the key audit matters since determining whether the revenue recognition criteria are met as well as determining whether the revenue is recorded in the financial statements in the correct period requires significant judgment of management.

Please refer to notes 2.7.1 and 23 to the financial statements for the Company's disclosures on revenue recognition, including the related accounting policy.

How the matter was addressed in the audit

We performed the following procedures in relation to the revenue recognition:

- The design and implementation of the controls on the revenue process have been evaluated. The Company's sales and delivery procedures have been analyzed.
- Terms of trade and delivery with respect to contracts made with customers have been examined and the timing of revenue recognition in the financial statements for the different shipment arrangements has been assessed.
- For substantive procedures, special emphasis is given for transactions where the goods billed but revenue has not been earned. Customers with the longest delivery period have been identified among the existing customers of the Company and a date range has been determined and sales lists have been provided from the relevant departments. The control of the completeness and accuracy of these lists have been tested.

In addition, we assessed the adequacy of the disclosures in Note 23 Revenue under TFRS.

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3) Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with TFRS, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

4) Auditor's Responsibilities for the Audit of the Financial Statements

Responsibilities of independent auditors in an independent audit are as follows:

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the standards on auditing issued by Capital Markets Board and SIA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with the standards on auditing issued by Capital Markets Board and SIA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. (The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.)
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.

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• Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

B) Report on Other Legal and Regulatory Requirements

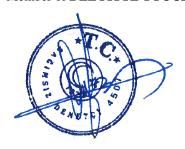
In accordance with paragraph four of the Article 398 of the Turkish Commercial Code No. 6102 ("TCC"), the auditor's report on the system and the committee of early detection of risk has been submitted to the Board of Directors of the Company on 10 February 2022.

In accordance with paragraph four of the Article 402 of TCC, nothing has come to our attention that may cause us to believe that the Company's set of accounts and financial statements prepared for the period 1 January-31 December 2021 does not comply with 2C and the provisions of the Company's articles of association in relation to financial reporting.

In accordance with paragraph four of the Article 402 of TCC, the Board of Directors provided us all the required information and documentation with respect to our audit.

The engagement partner on the audit resulting in this independent auditor's report is Osman Arslan.

DRT BAĞIMSIZ DENETİM VE SERBEST MUHASEBECİ MALİ MÜŞAVİRLİK A.Ş. Member of **DELOITTE TOUCHE TOHMATSU LIMITED**



Osman Arslan, SMMM Partner

İstanbul, 10 February 2022

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İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF FINANCIAL POSITION AS OF 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

		(Audited)	(Audited)	(Audited)	(Audited)
		Current Period 31 December	Current Period 31 December	Previous Period 1 31 December	Previous Period 31 December
		2021	2021	2020	2020
ASSETS	Note	USD'000	TRY'000	USD'000	TRY'000
Current Assets		1.950.491	25.998.080	1.764.025	12.948.824
Cash and Cash Equivalents	4	662.058	8.824.568	5.259	38.603
Trade Receivables		207.529	2.766.145	174.539	1.281.204
Due From Related Parties	32	121.531	1.619.882	135.274	992.977
Other Trade Receivables	9	85.998	1.146.263	39.265	288.227
Other Receivables		4.555	60.718	942.017	6.914.878
Due From Related Parties	32	1.592	21.225	937.255	6.879.919
Other Receivables	10	2.963	39.493	4.762	34.959
Financial Derivative Instruments	7	4.110	54.786	-	-
Inventories	11	1.044.265	13.919.002	625.386	4.590.643
Prepaid Expenses	12	20.362	271.402	6.833	50.154
Other Current Assets	20	7.612	101.459	9.991	73.342
Non Current Assets		2.232.514	29.757.191	2.097.214	15.394.599
Financial Investments	5	27	361	27	199
Other Receivables	10	443	5.900	1.389	10.193
Investments Accounted For Using Equity Method	6	27.781	370.292	31.327	229.956
Property, Plant and Equipment	13	2.053.188	27.366.949	1.897.591	13.929.264
Right of Use Assets	15	43.773	583.444	40.951	300.598
Intangible Assets	14	41.231	549.570	41.338	303.443
Prepaid Expenses		66.071	880.675	84.591	620.946
Due From Related Parties	32	3.350	44.650	1.753	12.868
Other Prepaid Expenses	12	62.721	836.025	82.838	608.078
TOTAL ASSETS	-	4.183.005	55.755.271	3.861.239	28.343.423

The details of presentation currency translation to TRY explained in Note 2.1.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF FINANCIAL POSITION AS OF 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

TAA DA MAYOG	N	31 December 2021	(Audited) Current Period 31 December 2021	(Audited) Previous Period 31 December 2020	31 December 2020
LIABILITIES	Note	USD'000	TRY'000	USD'000	TRY'000
Current Liabilities		643.508	8.592.839	383.427	2.814.545
Short Term Borrowings	8	151.482	2.022.735	6.613	48.544
Short Term Portion of Long Term Borrowings	8	58.350	779.150	21.842	160.334
Trade Payables		235.240	3.141.247	252.202	1.851.288
Due to Related Parties	32	32.613	435.475	52.443	384.960
Other Trade Payables	9	202.627	2.705.772	199.759	1.466.328
Payables for Employee Benefits	17	7.461	99.622	9.154	67.192
Other Payables	10	5.827	77.807	4.768	35.000
Derivative Financial Instruments	7	232	3.093	-	-
Deferred Revenue	21	38.655	516.163	15.094	110.800
Current Tax Liabilities	30	139.903	1.868.124	48.612	356.834
Short Term Provisions	18	6.125	81.784	8.479	62.243
Other Current Liabilities	20	233	3.114	16.663	122.310
Non Current Liabilities		599.510	8.005.263	483.354	3.548.061
Long Term Borrowings	8	168.572	2.250.936	134.433	986.802
Long Term Provisions		48.513	647.797	54.922	403.156
Long Term Provisions for Employee Benefits	17	48.513	647.797	54.922	403.156
Deferred Tax Liabilities	30	382.425	5.106.530	293.999	2.158.103
EQUITY		2.939.987	39.157.169	2.994.458	21.980.817
Share Capital	22	1.474.105	2.900.000	1.474.105	2.900.000
Inflation Adjustment to Capital	22	85	164	85	164
Other Comprehensive Income/Expense Not to be Reclassified					
to Profit/ (Loss)		(29.794)	23.500.964	(19.821)	9.020.007
Actuarial (Loss)/ Gain Funds	22	(29.794)	(166.482)	(19.821)	(54.295)
Foreign Currency Translation Reserves	22	-	23.667.446	-	9.074.302
Other Comprehensive Income/Expense to be Reclassified					
to Profit/ (Loss)		809	10.809	-	-
Cash Flow Hedging Gain (Loss)	22	809	10.809	-	-
Restricted Reserves Assorted from Profit	22	423.834	2.193.560	344.712	1.401.860
Retained Earnings	22	305.797	4.083.318	849.456	6.235.437
Net Profit for the Period		765.151	6.468.354	345.921	2.423.349
TOTAL LIABILITIES AND EQUITY	-	4.183.005	55.755.271	3.861.239	28.343.423

The details of presentation currency translation to TRY explained in Note 2.1.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

		(Audited)	(Audited)	(Audited)	(Audited)
		Current Period	Current Period	Previous Period	Previous Period
		1 January -	1 January -	1 January -	1 January -
		31 December 2021	31 December 2021	31 December 2020	31 December 2020
	Note	USD'000	TRY'000	USD'000	TRY'000
Revenue	23	4.317.579	36.499.516	2.415.829	16.924.093
Cost of Sales	23	(2.694.766)	(22.780.744)	(1.957.950)	(13.716.418)
GROSS PROFIT		1.622.813	13.718.772	457.879	3.207.675
Marketing, Sales and Distribution Expenses	25	(18.831)	(159.188)	(16.403)	(114.911)
General Administrative Expenses	25	(25.297)	(213.856)	(26.810)	(187.814)
Research and Development Expenses		(53)	(452)	(34)	(241)
Other Operating Income	26	10.646	89.999	30.520	213.806
Other Operating Expenses	26	(50.371)	(425.813)	(7.826)	(54.822)
OPERATING PROFIT		1.538.907	13.009.462	437.326	3.063.693
Income from Investing Activities	27	13	108	21.351	149.573
Expenses from Investing Activities	27	(333)	(2.812)	(948)	(6.642)
Share of Investments' Profit Accounted by Using The Equity Method	6	(679)	(5.742)	1.097	7.685
OPERATING PROFIT BEFORE FINANCE INCOME / (EXPENSES)		1.537.908	13.001.016	458.826	3.214.309
Finance Income	28	102.834	869.325	75.711	587.158
Finance Expense	29	(439.252)	(3.713.305)	(19.235)	(134.752)
PROFIT BEFORE TAX		1.201.490	10.157.036	515.302	3.666.715
Tax (Expense)/ Income	30	(436.339)	(3.688.682)	(169.381)	(1.243.366)
Current Corporate Tax (Expense)/ Income		(345.648)	(2.922.007)	(169.449)	(1.243.844)
Deferred Tax (Expense)/ Income		(90.691)	(766.675)	68	478
NET PROFIT FOR THE PERIOD		765.151	6.468.354	345.921	2.423.349
EARNINGS PER SHARE			2,2305		0,8356
(TRY 1 Nominal value per share)					

The details of presentation currency translation to TRY explained in Note 2.1.

The accompanying notes form an integral part of these financial statements.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF OTHER COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

		(Audited)	(Audited)	(Audited)	(Audited)
		Current Period	Current Period	Previous Period	Previous Period
		1 January -	1 January -	1 January -	1 January -
		31 December 2021	31 December 2021	31 December 2020	31 December 2020
	Note	USD'000	TRY'000	USD'000	TRY'000
PROFIT FOR THE PERIOD		765.151	6.468.354	345.921	2.423.349
OTHER COMPREHENSIVE INCOME					
Not to be reclassified subsequently to profit or loss					
Foreign Currency Translation Gain (Loss)		-	18.871.376	-	3.893.372
Actuarial Gain/(Loss) of Defined Benefit Plans	17	(12.466)	(140.234)	(1.348)	(7.039)
Tax Effect of Actuarial Gain/(Loss) of Defined Benefit Plans	30	2.493	28.047	270	1.408
To be reclassified subsequently to profit or loss					
Gain (Loss) in Cash Flow Hedging Reserves		1.037	13.858	-	-
Tax Effect of Gain (Loss) in Cash Flow Hedging Reserves	30	(228)	(3.049)	-	-
OTHER COMPREHENSIVE INCOME (EXPENSE) FOR THE PERIOD		(9.164)	18.769.998	(1.078)	3.887.741
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD		755.987	25.238.352	344.843	6.311.090

The details of presentation currency translation to TRY explained in Note 2.1.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

				*	Income (Expense) Not to to Profit/ (Loss)	Other comprehensive income (expense) to be reclassified subsequently to		Retained	Earnings	
(Audited)	Note	Share Capital	Inflation Adjustment to Capital	Foreign Currency Translation Reserves	Actuarial (Loss)/ Gain Funds	nrofit or loss Cash Flow Hedging Gain (Loss)	Restricted Reserves Assorted from Profit	Retained Earnings	Net Profit for the Period	Total Shareholders' Equity
1 January 2021 (Previously reported)	Note	2.900.000	164	13.629.734	(54.295)	-	1.401.860	1.680.005	2.423.349	21.980.817
Effect of change in accounting principle	2.2	-	_	(4.555.432)	-	-	_	4.555.432	_	_
1 January 2021		2.900.000	164	9.074.302	(54.295)	-	1.401.860	6.235.437	2.423.349	21.980.817
Net profit for the period		-	-	-	-	-	-	-	6.468.354	6.468.354
Other comprehensive income/(loss)		-	-	18.871.376	(112.187)	10.809	-	-	-	18.769.998
Total comprehensive income/(loss)		-	-	18.871.376	(112.187)	10.809	-	-	6.468.354	25.238.352
Increase (decrease) due to other change	2.1	-	-	(4.278.232)	-	-	-	4.278.232	-	_
Dividends (*)		-	-	-	-	-	-	(8.062.000)	-	(8.062.000)
Transfers		-	-	-	-	-	791.700	1.631.649	(2.423.349)	-
31 December 2021		2.900.000	164	23.667.446	(166.482)	10.809	2.193.560	4.083.318	6.468.354	39.157.169
(Audited)										
1 January 2020 (Previously reported)		2.900.000	164	9.736.362	(48.664)	-	1.364.160	84.277	2.155.428	16.191.727
Effect of change in accounting principle	2.2	-	-	(3.188.482)	-	-	-	3.188.482	-	-
1 January 2020		2.900.000	164	6.547.880	(48.664)	-	1.364.160	3.272.759	2.155.428	16.191.727
Net profit for the period		-	-	-	-	-	-	-	2.423.349	2.423.349
Other comprehensive income/(loss)		-	-	3.893.372	(5.631)	-	-	-	-	3.887.741
Total comprehensive income/(loss)		-	-	3.893.372	(5.631)	-	-	-	2.423.349	6.311.090
Increase (decrease) due to other change	2.1	-	-	(1.366.950)	-	=	-	1.366.950	-	_
Dividends (*)		-	-	-	-	-	-	(522.000)	-	(522.000)
Transfers		-	-	-	-	-	37.700	2.117.728	(2.155.428)	
31 December 2020		2.900.000	164	9.074.302	(54.295)	-	1.401.860	6.235.437	2.423.349	21.980.817

^(*) At the Ordinary General Meeting held on March 16, 2021, it has been approved unanimously to distribute net profit of 2020 and accumulated earnings amounting to TRY 3.712.000 thousand (14 July 2020: TRY 522.000 thousand) (gross dividend per share:TRY 1,28(2020: TRY 0,18)). The dividend payment has started at 24 March 2021. At the Extraordinary General Meeting held on December 6, 2021, it has been approved unanimously to distribute net profit accumulated earnings amounting to TRY 4.350.000 thousand (gross dividend per share:TRY 1,50). Second dividend payment has started at 8 December 2021.

Retained earnings; in the condensed financial statements, in accordance with TAS 21, the details of conversion of retained earnings to the presentation currency, Turkish Lira, in the condensed statement of financial position dated 31 December 2021 by converting to US Dollars at historical rates, are explained in Note 2.1.

The accompanying notes form an integral part of these financial statements.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

		(Audited) 1 January -	(Audited) 1 January -	(Audited) 1 January -	(Audited) 1 January -
		31 December 2021	31 December 2021	31 December 2020	31 December 2020
		USD'000	TRY'000	USD'000	TRY 000
CASH FLOWS FROM OPERATING ACTIVITIES	Note_	490.106	1.036.663	564.174	4.035.556
Profit (Loss) for The Period Adjustments to Reconcile Profit (Loss)		765.151 446.633	6.468.354 3.884.308	345.921 250.607	2.423.349 1.812.839
Adjustments to Recording Front (Loss) Adjustments for Depreciation and Amortisation Expenses	23/25/26	109.734	927.662	110.841	776.490
Adjustments for Impairment Loss (Reversal of Impairment Loss)	23/23/20	(461)	(4.094)	2.187	15.037
Adjustments for Provision (Reversal of Provision) for Receivables	9/10	13	(83)	476	3.045
Adjustments for Provision (Reversal of Provision) for Inventories	11	(474)	(4.011)	1.711	11.992
Adjustments for Provisions	17	16.376	138.443	14.408	100.931
Adjustments for Provision (Reversal of Provision) for Employee Termination	18	15.242 1.134	128.852 9.591	12.508 1.900	87.621 13.310
Adjustments for Provision (Reversal of Provision) for Pending Claims and/or Adjustments for Interest (Income) and Expenses	10	(88.109)	(744.845)	(25.627)	(179.536)
Adjustments for Interest Income	28	(97.547)	(824.635)	(35.340)	(247.573)
Adjustments for Interest Expense	29	11.295	95.487	10.606	74.294
Unearned Financial Income from Credit Sales		(1.857)	(15.697)	(893) 1.023	(6.257) 7.167
Adjustments for Unrealised Foreign Exchange Differences Adjustments for Fair Value (Gains) Losses	20	(7.684)	(106.510)	1.023	7.167
· ·	28	(2.777)	(23.476)	-	-
Adjustments for Fair Value (Gains) Losses on Derivative Financial Instruments Adjustments for Undistributed Profits of Investments Accounted for Using Equity	6	(2.777) 679	(23.476) 5.742	(1.097)	(7.685)
Adjustments for Tax (Income) Expenses	30	436.339	3.688.682	169.381	1.243.366
Adjustments for Losses (Gains) on Disposal of Non-Current Assets		320	2.704	(20.403)	(142.931)
Adjustments for Losses (Gains) on Disposal of Property, Plant and Equipment	27	320	2.704	(20.403)	(142.931)
Other adjustments for Losses (Gains) Reconciliation		(17.784)	- (6 192 197)	(106)	964.662
Changes in Working Capital Adjustments for Decrease (Increase) in Trade Receivables		(463.815) (31.947)	(6.182.197) (425.822)	117.793 6.004	864.663 44.073
Decrease (Increase) in Trade Receivables from Related Parties		13.743	183.180	(1.320)	(9.689)
Decrease (Increase) in Trade Receivables from Third Parties		(45.690)	(609.002)	7.324	53.762
Adjustments for Decrease (Increase) in Other Receivables Related from Operations		2.745	36.588	(2.590)	(19.012)
Decrease (Increase) in Other Receivables from Operations from Third Parties		2.745	36.588	(2.590)	(19.012)
Decrease (Increase) in Derivative Financial Instruments		(4.110)	(54.786)	-	250.052
Adjustments for Decrease (Increase) in Inventories		(412.407) (14.075)	(5.496.972) (187.610)	49.173 (13.272)	360.952 (97.420)
Decrease (Increase) in Prepaid Expenses Adjustments for Increase (Decrease) in Trade Payables		(16.962)	(226.086)	51.001	374.373
Increase (Decrease) in Trade Payable to Related Parties		(19.830)	(264.314)	16.166	118.667
Increase (Decrease) in Trade Payable to Third Parties		2.868	38.228	34.835	255.706
Adjustments for Increase (Decrease) in Other Payables Related from Operations		(615)	(8.197)	298	2.189
Increase (Decrease) in Other Payables to Third Parties Related from Operations		(615) 4.046	(8.197) 53.929	298 (15)	2.189 (110)
Increase (Decrease) in Derivative Liabilities Adjustments for Other Increase (Decrease) in Working Capital		9.510	126.759	27.194	199.618
Decrease (Increase) in Other Assets Related from Operations		2.379	31.710	4.317	31.689
Increase (Decrease) in Other Payables Related from Operations		7.131	95.049	22.877	167.929
Cash Flows Provided by Operating Activities	17	747.969	4.170.465	714.321	5.100.851
Payments Related to Provisions for Employee Termination Benefits	17 18	(3.425) (82)	(28.954)	(3.872)	(27.122)
Payments Related to Other Provisions Income Taxes Refund (Paid)	30	(254.356)	(696) (3.104.152)	(62) (146.213)	(431) (1.037.742)
CASH FLOWS FROM INVESTING ACTIVITIES		(245.738)	(2.449.549)	(180.025)	(1.314.282)
Cash Outflows Arising From Purchase of Shares or Capital Increase of Associates and/or		2.351	17.500	1.981	13.333
Cash Inflow from Sales of Property, Plant, Equipment and Intangible Assets		54	473	23.217	162.640
Cash Inflow from Sales of Property, Plant and Equipment	13/14/27	54 (268.056)	473 (2.266.065)	23.217 (153.435)	162.640 (1.074.891)
Cash Outflow from Purchase of Property, Plant, Equipment and Intangible Assets Cash Outflow from Purchase of Property, Plant and Equipment	13	(267.455)	(2.260.981)	(152.368)	(1.067.415)
Cash Outflow from Purchase of Irroperty, I tain and Equipment Cash Outflow from Purchase of Intangible Assets	14	(601)	(5.084)	(1.067)	(7.476)
Cash Advances and Debts Given		19.054	(207.849)	(52.109)	(417.527)
Cash Advance and Debts Given to Related Parties		(1.600)	(31.782)	(52.100)	(417.527)
Other Cash Advances and Debts Given Dividends Received	6	20.654 859	(176.067) 6.392	(52.109) 321	(417.527) 2.163
CASH FLOWS FROM FINANCING ACTIVITIES	-	458.419	1.498.133	(374.156)	(3.737.415)
Cash Inflow from Borrowings	8	326.370	2.759.036	255.447	1.789.535
Cash Inflow from Loans		326.370	2.759.036	255.447	1.789.535
Cash Outflow from Repayments of Borrowings	8	(96.764)	(776.469)	(402.749)	(2.821.458)
Cash Outflow from Loan Repayments	32	(96.764) 935.320	(776.469) 6.858.694	(402.749) (174.908)	(2.821.458) (2.352.515)
Decrease in Other Payables to Related Parties Cash Outflow from Debt Payments for Leasing Contracts	8	(4.371)	(36.953)	(4.686)	(32.825)
Dividends Paid		(793.135)	(8.058.958)	(76.224)	(521.883)
Interest Paid	8	(3.993)	(33.751)	(5.634)	(40.645)
Interest Received		94.992	786.534	34.598	242.376
NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS BEFORE EFFECT OF FYCHANCE PATE CHANCES		702.787	85.247	9.993	(1.016.141)
OF EXCHANGE RATE CHANGES Effect of Exchange Rate Changes on Cash and Cash Equivalents					
	_	(49.372)	8.655.610	(14.531)	996.547
NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS CASH AND CASH EQUIVALENTS AT THE DECININING OF THE DEDICED.		653.415	8.740.857	(4.538)	(19.594)
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF THE PERIOD CASH AND CASH FOLIVALENTS AT THE END OF THE PERIOD	- 4 -	5.259	38.603	9.797	58.197
CASH AND CASH EQUIVALENTS AT THE END OF THE PERIOD	_ 4 _	658.674	8.779.460	5.259	38.603

- As of 31 December 2021, the Company's total amount of time deposit interest accrual is TRY 45.108 thousand (USD 3.834 thousand) (31 December 2020: None).
- In the statement of financial position, since the functional currency of the Company is USD, exchange differences between the accrued and payment dates of the dividend payables to the shareholders whose original currency is Turkish Lira are reported in Other Adjustments to reconcile Profit (Loss).

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 1 – COMPANY'S ORGANIZATION AND NATURE OF OPERATIONS

Iskenderun Demir ve Çelik A.Ş. ("the Company") registered in 12 November 1968 and published at 19 November 1968 in the trade registry gazette. The Company established in 3 October 1970 in the southern of Turkey on the Mediterranean coast in the distance of 17 km from Iskenderun in Payas region. The principal activities of the Company are production and sale of iron products, flat and long steel products and their by-products. The Company's main products are billet,slab,coil,plate,wire rod and by-products are coke,benzol,ammonium sulphate and slag.

The Company had become an affiliated company of the Turkish Iron and Steel Administration with the decision no 93/T-85 dated 10 September 1993 of Supreme Planning Committee. Then with the decision no 98/20 of Privatization Committee dated 2 March 1998, the Company was transferred to Turkish Privatization Administration. Ultimately, shares of the Company were transferred to Ereğli Demir ve Çelik Fabrikaları T.A.Ş. ("Erdemir") in 31 January 2002 by the Turkish Privatization Administration with the decision no 2001/08 which dated 8 February 2001. The immediate parent of Ereğli Demir ve Çelik Fabrikaları T.A.Ş is Ataer Holding A.Ş. The ultimate controlling party is Ordu Yardımlaşma Kurumu (OYAK).

The main operations of the subsidiaries of the Company and the share percentages of İsdemir for these companies are as follows:

	Country of		2021	2020
Name of Company	Operation	Operation	Share (%)	Share (%)
Teknopark Hatay A.Ş.	Turkey	R&D Centre	5	5
İsdemir Linde Gaz Ortaklığı A.Ş.	Turkey	Energy	50	50

The registered address of the Company is Karayılan Beldesi, 31319 İskenderun/HATAY.

İskenderun Demir ve Çelik A.Ş. shares have been traded on Borsa Istanbul since 26 March 2016.

The number of the personnel employed by the Company as of reporting period are as follows:

	31 December 2021	31 December 2020
	Personnel	Personnel
Paid Hourly Personnel	3.124	2.988
Paid Monthly Personnel	1.675	1.714
	4.799	4.702

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS

2.1 Basis of Presentation

The Company maintains its legal books of account and prepares their statutory financial statements ("Statutory Financial Statements") in accordance with accounting principles issued by the Turkish Commercial Code ("TCC") and tax legislation.

The accompanying financial statements are prepared in accordance with the requirements of Capital Markets Board ("CMB") Communiqué Serial II, No: 14.1 "Basis of Financial Reporting in Capital Markets", which was published in the Official Gazette No:28676 on 13 June 2013. The accompanying financial statements are prepared based on the Turkish Accounting Standards and interpretations ("TAS") that have been put into effect by the Public Oversight Accounting and Auditing Standards Authority ("POA") under Article 5 of the Communiqué.

The financial statements and disclosures have been prepared in accordance with the resolution of CMB dated 15 April 2019 about the "illustrations of financial statements and application guidance".

The financial statements have been prepared on the historical cost basis except for certain properties and derivative financial instruments that are measured at revalued amounts or fair values. Historical cost is generally based on the fair value of the consideration given in exchange for assets.

Functional and reporting currency

Although the currency of the country in which is the Company is domiciled is Turkish Lira (TRY), the Company's functional currency is determined as US Dollar. US Dollar is used to a significant extent in, and has a significant impact on the operations of the Company and reflects the economic substance of the underlying events and circumstances relevant to the Company. Therefore, the Company uses the US Dollar in measuring items in its financial statements and as the functional currency.

The accompanying financial statements are prepared in Turkish Lira (TRY) in accordance with the requirements of Capital Markets Board ("CMB") Communiqué Serial II, No: 14.1 "Basis of Financial Reporting in Capital Markets", which was published in the Official Gazette No:28676 on 13 June 2013.

Functional currency of the joint venture

The functional currency of the Company's joint venture İsdemir Linde Gaz Ortaklığı A.Ş. is US Dollars.

Presentation currency translation

Company; Pursuant to the Public Oversight, Accounting and Auditing Standards Authority's "POA" announcement dated March 15, 2021, "On the Next Measurement of Foreign Currency Monetary Items According to Turkish Accounting Standards", the assets and liabilities in the summary financial statements are used by using the buying and selling rates valid as of the end of the reporting period. It has been valued and translated into the presentation currency at the same exchange rates.

- a) The assets on condensed financial position as of 31 December 2021 are translated from US Dollars into TRY using the Central Bank of the Republic of Turkey's buying exchange rate as of 31 December 2021 which is TRY 13,3290=US \$ 1 and the liabilities selling rate of exchange which is TRY 13,3530=US \$ 1 on the balance sheet date (31 December 2020: TRY 7,3405= US \$ 1).
- b) Profit or loss statements for the year ended 31 December 2021 due to the significant fluctuation in the exchange rate in 2021; 8,4537 TRY = US \$ 1, which is the result of the conversion of the monthly net profits calculated on a monthly basis with the average exchange rates of the relevant month announced by the Central Bank of the Republic of Turkey. (31 December 2020: TRY 7,0055 = US \$ 1).

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.1 Basis of Presentation (cont'd)

- c) Retained earnings; In the financial statements, in accordance with TAS 21, they are converted to US Dollars at historical rates and followed in US Dollars. Retained earnings in the statement of financial position dated 31 December 2021 are presented by converting them into TRY using the foreign exchange selling rate effective as of 31 December 2021 announced by the Central Bank of the Republic of Turkey, TRY 13.3530 = US \$ 1 (31 December 2020: TRY 7,3405= US \$ 1)
- d) Exchange differences are shown in other comprehensive income as of foreign currency translation reserve.
- e) The differences between presentation of statutory and historical figures are recognised as translation differences under equity. All capital, capital measures and other measures are represented with their statutory figures, other equity accounts are represented with their historic cost figures in the accompanying financial statements.

USD amounts presented in the financial statements

The figures in USD amounts presented in the accompanying financial statements comprising the statements of financial position as of 31 December 2021 and 31 December 2020, statement of income and other comprehensive income, and statement of cash flows for the year ended 31 December 2021 representing the financial statements within the frame of functional currency change that the Company has made, which is effective as of 1 July 2013, prepared in accordance with the TAS 21- Effects of Changes in Foreign Exchange Rates.

Shares in subsidiaries and joint ventures

			Share of Capital and		
			right to vote of	Company (%)	
Shares in Subsidiaries	Business	Valid	31 December	31 December	
and Joint Ventures	Area	Currency	2021	2020	
Teknopark Hatay A.Ş.	R&D Centre	TRY	5%	5%	
İndamin I inda Can Ontabley A C	Industrial Gas				
İsdemir Linde Gaz Ortaklığı A.Ş.	Production and Sales	USD	50%	50%	

An associate is an entity over which the Company has significant influence. Significant influence is the power to participate in the financial and operating policy decisions of the investee but is not control or joint control over those policies.

A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the joint arrangement. Joint control is the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require unanimous consent of the parties sharing control.

The results and assets and liabilities of associates or joint ventures are incorporated in these financial statements using the equity method of accounting, except when the investment, or a portion thereof, is classified as held for sale, in which case it is accounted for in accordance with TFRS 5. Under the equity method, an investment in associate or a joint venture is initially recognized in the statement of financial position at cost and adjusted thereafter to recognize the Company's share of the profit or loss and other comprehensive income of the associate or a joint venture.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.1 Basis of Presentation (cont'd)

When the Company's share of losses of an associate or a joint venture exceeds the Company's interest in that associate or a joint venture (which includes any long-term interests that, in substance, form part of the Company's net investment in the associate or a joint venture), the Company discontinues recognizing its share of further losses. Additional losses are recognized only to the extent that the Company has incurred legal or constructive obligations or made payments on behalf of the associate or a joint venture.

When a group entity transacts with an associate or a joint venture of the Company, profits and losses resulting from the transactions with the associate or joint venture are recognised in the Company's financial statements only to the extent of interests in the associate or joint venture that are not related to the Company.

Going concern

The Company prepared its financial statements in accordance with the going concern assumption.

Approval of the financial statements

The financial statements have been approved on 10 February 2022 by the Board of Directors. The General Assembly has the authority to revise the financial statements.

2.2 Restatement and errors in the accounting policies and estimates

Any change in the accounting policies resulted from the first time adoption of a new standards is made either retrospectively or prospectively in accordance with the transition requirements of the standards. Changes without any transition requirement, material changes in accounting policies or material errors are corrected, retrospectively by restating the prior period financial statements. If changes in accounting estimates are related to only one period, they are recognized in the period when changes are applied; if changes in estimates are related to future periods, they are recognized both in the period where the change is applied and future periods prospectively.

"Retained Earnings' Profit or Loss" in the condensed statement of financial position are translated into US Dollars at historical rates and followed as US Dollars in accordance with TAS 21. For a meaningful representation of the translation of prior years' profit followed in US Dollars into Turkish Lira, the presentation currency, the differences arising from the translation of "Prior Years' Profit or Loss" into Turkish Lira at the closing rates announced by the Central Bank of the Republic of Turkey as of the relevant reporting period are recognized under the "Foreign Currency Translation Differences".

The classifications made in the summary statement of financial position as of 31 December 2020 are as follows:

	(Previously Reported)	(Restated)	(Difference)
Account	31 December 2020	31 December 2020	31 December 2020
Accumulated profit or loss	1.680.005	6.235.437	4.555.432
Foreign Currency Conversion Adjustments	13.629.734	9.074.302	(4.555.432)
			-

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.2 Restatement and errors in the accounting policies and estimates (cont'd)

The classifications made in the summary statement of financial position as of 1 January 2020 are as follows:

	(Previously Reported)	(Restated)	(Difference)
Account	1 January 2020	1 January 2020	1 January 2020
Accumulated profit or loss	84.277	3.272.759	3.188.482
Foreign Currency Conversion Adjustments	9.736.362	6.547.880	(3.188.482)
			-

2.3 Comparative Information and Restatement of Financial Statements with Prior Periods

The Company's financial statements are prepared in comparison with the previous period in order to allow for the determination of the financial position and performance trends in accordance with a new illustrative financial statements. Comparative information is reclassified when necessary and important differences are explained in order to ensure compliance with the presentation of the current period financial statements.

2.4 Significant Judgements and Estimates of the Company on Application of Accounting Policies

The Company, according to TAS makes estimates and assumptions prospectively while preparing its financial statements. These accounting estimates are rarely identical to the actual results. The estimates and assumptions that may cause significant adjustments to the carrying values of assets and liabilities in the following reporting periods are listed below:

2.4.1 Useful lives of property, plant and equipment and intangible assets

The Company calculates depreciation for the fixed assets by taking into account their production amounts and useful lives that are stated in Note 2.7.3 and 2.7.4 (Note 13, Note 14).

2.4.2 Deferred tax

The Company recognizes deferred tax on the temporary timing differences between the carrying amounts of assets and liabilities in the financial statements prepared in accordance with TFRS and statutory financial statements which is used in the computation of taxable profit. The related differences are generally due to the timing difference of the tax base of some income and expense items between financial statements prepared in accordance with statutory and TFRS. The Company has deferred tax assets resulting from tax loss carry-forwards and deductible temporary differences, which could reduce taxable income in the future periods. All or partial amounts of the realizable deferred tax assets are estimated in current circumstances. The main factors which are considered include future earnings potential; cumulative fiscal losses in recent years; history of loss carry-forwards and other tax assets expiring, the carry-forward period associated with the deferred tax assets, future reversals of existing taxable temporary differences that would, if necessary, be implemented, and the nature of the income that can be used to realize the deferred tax asset (Note 30).

2.4.3 Fair values of derivative financial instruments

The Company values its derivative financial instruments by using the foreign exchange and interest rate estimations and based on the valuation estimates of the market values as of the balance sheet date (Note 7).

2.4.4 Provision for expected loan loss

Allowance for expected loan loss provisions reflect the future loss that the Company anticipates to incur from the trade receivables as of the balance sheet date which is subject to collection risk considering the current economic conditions.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.4 Significant Judgments and Estimates of the Company on Application of Accounting Policies (cont'd)

2.4.4 Provision for expected loan loss (cont'd)

During the impairment test for the receivables, the debtors are assessed with their prior year performances, their credit risk in the current market, their performance after the balance sheet date up to the issuing date of the financial statements; and also the renegotiation conditions with these debtors are considered. As of the reporting date, the provision for doubtful receivables is presented in Note 9.

2.4.5 Provision for inventories

During the assessment of the provision for inventory the following are considered; analyzing the inventories physically and historically, considering the employment and usefulness of the inventories respecting to the technical personnel view. Sales prices listed and related data by sales prices of realized sales after balance sheet date, average discount rates given for sale and expected cost incurred to sell are used to determine the net realizable value of the inventories. As a result of this, the provision for inventories with the net realizable values below the costs and the slow moving inventories are presented in Note 11.

2.4.6 Provisions for employee benefits

Actuarial assumptions about discount rates, inflation rates, future salary increases and employee turnover rates are made to calculate the Company's provision for employee benefits. The details related with the defined benefit plans are stated in Note 17.

2.4.7 Provision for lawsuits

Provision for lawsuits is evaluated by the Company Management based on opinions of Company's Legal Council and legal consultants. The Company Management determines the amount of provisions based on best estimates. As of the balance sheet date, the provision for lawsuits is stated in Note 18.

2.4.8 Impairments on Assets

The Company performs impairment tests for assets that are subject to depreciation and amortization in case of being not possible to prevent recovery of the assets at each reporting period. Assets are carried at the lowest levels which there are separately identifiable cash flows for evaluation of impairment (cash generating units). As a result of the impairment works performs by the Company management, as of the reporting date any impairment except calculated provision on non-financial assets has not been estimated.

2.4.9 Impairment of Financial Assets

The loss allowances for financial assets are based on assumptions about risk of default and expected loss rates. The Company uses judgement in making these assumptions and selecting the inputs to the impairment calculation, based on the Company's past history, existing market conditions as well as forward looking estimates at the end of each reporting period.

2.4.10 Loss provision calculation

When measuring ECL the Company uses reasonable and supportable forward looking information, which is based on assumptions for the future movement of different economic drivers and how these drivers will affect each other.

İSKENDERUN DEMİR VE ÇELİK A.Ş.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.4.10 Loss provision calculation (cont'd)

Loss given default is an estimate of the loss arising on default. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, taking into account cash flows from collateral and integral credit enhancements.

Probability of default constitutes a key input in measuring ECL. Probability of default is an estimate of the likelihood of default over a given time horizon, the calculation of which includes historical data, assumptions and expectations of future conditions.

2.5 Offsetting

Financial assets and liabilities are offset and the net amounts are reported with their net values in the balance sheet where either there is a legally enforceable right to offset the recognized amounts or there is an intention to settle on a net basis, or realize the asset and settle the liability simultaneously.

2.6 Adoption of New and Revised Financial Reporting Standards

The accounting policies used in the preparation of the financial statements for the accounting period ending as of 31 December 2021 have been applied consistently with those used in the previous year, except for the new and amended TFRS standards and TFRS interpretations valid as of 1 January 2021, which are summarized below.

The effects of these standards and interpretations on the financial position and performance of the Company are explained in the relevant paragraphs.

The new standards, amendments and interpratations which are effective from 2021

Amendments to TFRS 9, TAS 39, TFRS 7, TFRS 4 and TFRS 16 Interest Rate Benchmark Reform — Phase 2

The amendments in Interest Rate Benchmark Reform — Phase 2 (Amendments to TFRS 9, TAS 39, TFRS 7, TFRS 4 and TFRS 16) introduce a practical expedient for modifications required by the reform, clarify that hedge accounting is not discontinued solely because of the IBOR reform, and introduce disclosures that allow users to understand the nature and extent of risks arising from the IBOR reform to which the entity is exposed to and how the entity manages those risks as well as the entity's progress in transitioning from IBORs to alternative benchmark rates, and how the entity is managing this transition.

The amendments to TFRS 9, TAS 39, TFRS 7, TFRS 4 and TFRS 16 are all effective for annual periods beginning on or after 1 January 2021. Early application is permitted.

These standards, amendments and improvements have no impact on the financial position and performance of the Company.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.6 Adoption of New and Revised Financial Reporting Standards (cont'd)

New and revised TFRSs in issue but not vet effective

The Company has not yet adopted the following standards and amendments and interpretations to the existing standards:

TFRS 17 : Insurance Contracts

Amendments to TAS 1 : Classification of Liabilities as Current or NonCurrent

Amendments to TFRS 3 : Reference to the Conceptual Framework

Amendments to TAS 16 : Property, Plant and Equipment – Proceeds before

Intended Use

Amendments to TAS 37 : Onerous Contracts – Cost of Fulfilling a Contract : Amendments to TFRS 9 Financial Instruments

Annual Improvements to TFRS Standards

2018-2020

Amendments to TFRS 4 : Extension of the Temporary Exemption from Applying

Amendments to TFRS 16 : COVID-19 Related Rent Concessions beyond 30 June

2021

Amendments to TAS 1 : Disclosure of Accounting Policies : Definition of Accounting Estimates Amendments to TAS 8

: Deferred Tax related to Assets and Liabilities arising Amendments to TAS 12

from a Single Transaction

TFRS 17 Insurance Contracts

TFRS 17 requires insurance liabilities to be measured at a current fulfillment value and provides a more uniform measurement and presentation approach for all insurance contracts. These requirements are designed to achieve the goal of a consistent, principle-based accounting for insurance contracts. TFRS 17 supersedes TFRS 4 Insurance Contracts as of 1 January 2023.

Amendments to TAS 1 Classification of Liabilities as Current or Non-Current

The amendments aim to promote consistency in applying the requirements by helping companies determine whether, in the statement of financial position, debt and other liabilities with an uncertain settlement date should be classified as current (due or potentially due to be settled within one year) or non-current.

Amendments to TAS 1 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

Amendments to TFRS 3 Reference to the Conceptual Framework

The amendments update an outdated reference to the Conceptual Framework in TFRS 3 without significantly changing the requirements in the standard.

The amendments are effective for annual periods beginning on or after 1 January 2022. Early application is permitted if an entity also applies all other updated references (published together with the updated *Conceptual Framework*) at the same time or earlier.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.6 Adoption of New and Revised Financial Reporting Standards (cont'd)

Amendments to TAS 16 Proceeds before Intended Use

The amendments prohibit deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognizes the proceeds from selling such items, and the cost of producing those items, in profit or loss.

The amendments are effective for annual periods beginning on or after 1 January 2022. Early application is permitted.

Amendments to TAS 37 Onerous Contracts – Cost of Fulfilling a Contract

The amendments specify that the 'cost of fulfilling' a contract comprises the 'costs that relate directly to the contract'. Costs that relate directly to a contract can either be incremental costs of fulfilling that contract or an allocation of other costs that relate directly to fulfilling contracts.

The amendments published today are effective for annual periods beginning on or after 1 January 2022. Early application is permitted.

<u>Annual Improvements to TFRS Standards 2018-2020 Cycle Amendments to TFRS 9 Financial Instruments</u>

The amendment clarifies which fees an entity includes in assessing whether to derecognize a financial liability. An entity includes only fees paid or received between the entity (the borrower) and the lender, including fees paid or received by either the entity or the lender on the other's behalf.

Amendments to TFRS 4 Extension of the Temporary Exemption from Applying TFRS 9

With the postponement of the effective date of TFRS 17 to 1 January 2023, the expiry date of the temporary exemption period for the application of TFRS 9 provided to insurance companies has also been revised to 1 January 2023.

Amendments to TFRS 16 COVID-19 Related Rent Concessions beyond 30 June 2021

Public Oversight Accounting and Auditing Standards Authority ("POA") has published COVID-19 Related Rent Concessions beyond 30 June 2021 (Amendment to TFRS 16) that extends, by one year, the 30 June 2021 amendment that provides lessees with an exemption from assessing whether a COVID-19 related rent concession is a lease modification.

On issuance, the practical expedient was limited to rent concessions for which any reduction in lease payments affects only payments originally due on or before 30 June 2021. Since lessors continue to grant COVID-19 related rent concessions to lessees and since the effects of the COVID-19 pandemic are ongoing and significant, the POA decided to extend the time period over which the practical expedient is available for use.

The new amendment is effective for lessees for annual reporting periods beginning on or after 1 April 2021 and earlier application is permitted.

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These standards, amendments and improvements are evaluated on the condensed financial position and performance of the Company.

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.6 Adoption of New and Revised Financial Reporting Standards (cont'd)

Amendments to TAS 1 Disclosure of Accounting Policies

The amendments require that an entity discloses its material accounting policies, instead of its significant accounting policies.

Amendments to TAS 1 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

Amendments to TAS 8 Definition of Accounting Estimates

With this amendment, the definition of "a change in accounting estimates" has been replaced with the definition of "an accounting estimate", sample and explanatory paragraphs regarding estimates have been added, and the differences between application of an estimate prospectively and correction of errors retrospectively have been clarified.

Amendments to TAS 8 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

Amendments to TAS 12 Deferred Tax related to Assets and Liabilities arising from a Single Transaction

The amendments clarify that the initial recognition exemption does not apply to transactions in which equal amounts of deductible and taxable temporary differences arise on initial recognition.

Amendments to TAS 12 are effective for annual reporting periods beginning on or after 1 January 2023 and earlier application is permitted.

The Company evaluates the effects of these standards, amendments and improvements on the financial statements.

2.7 Valuation Principles Applied / Significant Accounting Policies

Accounting policies implemented during preparation of financial statemens as follows:

2.7.1 Revenue recognition

Company recognizes revenue when the goods or services is transferred to the customer and when performance obligation is fulfilled. Goods is counted to be transferred when the control belongs to the customer. The company constitutes the largest share in the revenues of coils in the flat product group and billets and wire rod in the long product group.

Company recognizes revenue based on the following main principles:

- a) Identification of customer contracts
- b) Identification of performance obligations
- c) Determination of transaction price in the contract
- d) Allocation of price to performance obligations

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e) Recognition of revenue when the performance obligations are fulfilled

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.1 Revenue recognition (cont'd)

Company recognized revenue from its customers only when all of the following criteria are met:

- a) The parties to the contract have approved the contract (in writing, orally or in accordance with other customary business practices) and are committed to perform their respective obligations,
- b) Company can identify each party's rights regarding the goods or services to be transferred,
- c) Company can identify the payment terms for the goods or services to be transferred;
- d) The contract has commercial substance,
- e) It is probable that Company will collect the consideration to which it will be entitled in exchange for the goods or services that will be transferred to the customer. In evaluating whether collectability of an amount of consideration is probable, an entity shall consider only the customer's ability and intention to pay that amount of consideration when it is due.

Interest income is accrued in the relevant period in proportion to the remaining principal balance and the effective interest rate that reduces the estimated cash inflows to be obtained from the relevant financial asset to the book value of the asset in question. Interest income from the Company's time deposit investments are recognized under finance income, while maturities sales interest income from trade receivables are recognized in revenue.

2.7.2 Inventories

Inventories are valued at the lower of cost or net realizable value. The costs, including an appropriate portion of fixed and variable overhead expenses, are assigned to inventories held by the method most appropriate to the particular class of inventory, with the majority valued by using the monthly weighted average method. Net realizable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale.

2.7.3 Property, plant and equipment

Property, plant and equipment stated through the value of determined by using the historical cost approach that reflects the cost of the assets in purchase date adjusted for impairment and accumulated depreciation.

The carrying values of property, plant and equipment are reviewed for impairment when events or changes in circumstances indicate the carrying value may not be recoverable. If any such indication exists and where the carrying values exceed the estimated recoverable amount, the assets or cash-generating units are written down to their recoverable amounts. The recoverable amount of property, plant and equipment is the higher of net selling price and value in use.

In assessing the value in use, the estimated future cash flows are discounted to their present values using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. For an asset that does not generate largely independent cash inflows, the recoverable amount is determined for the cash-generating unit to which the asset belongs. Impairment losses are recognized in the income statement.

Depreciation is recognized so as to write off the cost or valuation of assets, other than freehold land and properties under construction, less their residual values over their estimated useful lives, using the straight-line method and produce amount. The estimated useful lives, residual values and depreciation method are reviewed at the end of each reporting period, with the effect of any changes in estimate accounted for on a prospective basis.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.3 Property, plant and equipment (cont'd)

The rates that are used to depreciate the fixed assets are as follows:

_	Rates
Buildings	2-16%
Land improvements	2-33% and units of production level
Machinery and equipment	3-50% and units of production level
Vehicles	5-25% and units of production level
Furniture and fixtures	5-33%
Exploration costs and other fixed assets with speacial useful lifes	5-10% and units of production level
Other tangible fixed assets	5-25%

Expenses after the capitalization are added to the cost of related asset and reflected in financial statements as a separate asset if they shall mostly provide an economic benefit and their cost is measured in a trustable manner. Tangible assets are reviewed for impairment if there are conditions showing that the securities are more than amount recoverable. Assets are grouped at the lowest level which is cash-generating unit in order to determine impairment. Carrying amount of a tangible asset and recoverable value is the one which is higher than the net sales price following the deduction of commensurable value for the sale of the asset. Useful life of assets are reviewed as of date of balance sheet and adjusted, if required.

Maintenance and repair expenses are recorded as expense to the income statement of the related period. The Company omits the carrying values of the changed pieces occurred with respect to renovations from the balance sheet without considering whether they are subject to depreciation in an independent manner from other sections. Main renovations are subject to deprecation based on the shortest of residual life of the related tangible asset or useful life of the renovation itself.

Advances paid related to purchasing of tangible assets are monitored in prepaid expenses under fixed assets until the related asset is capitalized or recognized under on-going investments.

2.7.4 Intangible assets

Intangible assets purchased are recognized at acquisition cost less any amortization and impairment loss.

Intangible assets are amortized principally on a straight-line basis over their estimated useful lives and production amounts. The estimated useful life and amortization method are reviewed at the end of each annual reporting period, and any changes in the estimate are accounted for on a prospective basis.

The amortization rates of the intangible assets are stated below:

	Rates
Rights	2-33%

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.5 Leases

The Company as lessee

The Company assesses whether a contract is or contains a lease, at inception of the contract. The Company recognises a right-of-use asset and a corresponding lease liability with respect to all lease arrangements in which it is the lessee, except for short-term leases (defined as leases with a lease term of 12 months or less) and leases of low value assets. For these leases, the Company recognises the lease payments as an operating expense on a straight-line basis over the term of the lease unless another systematic basis is more representative of the time pattern in which economic benefits from the leased assets are consumed.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted by using the rate implicit in the lease. If this rate cannot be readily determined, the Company uses its incremental borrowing rate.

Lease payments included in the measurement of the lease liability comprise:

- fixed lease payments (including in-substance fixed payments), less any lease incentives;
- variable lease payments that depend on an index or rate, initially measured using the index or rate at the commencement date;
- the amount expected to be payable by the lessee under residual value guarantees;
- the exercise price of purchase options, if the lessee is reasonably certain to exercise the options; and
- payments of penalties for terminating the lease, if the lease term reflects the exercise of an option to terminate the lease.

The lease liability is presented as under borrowings in the statement of financial position. The lease liability is subsequently measured by increasing the carrying amount to reflect interest on the lease liability (using the effective interest method) and by reducing the carrying amount to reflect the lease payments made. The Company remeasures the lease liability (and makes a corresponding adjustment to the related right-of-use asset) whenever:

- the lease term has changed or there is a change in the assessment of exercise of a purchase option, in which case the lease liability is remeasured by discounting the revised lease payments using a revised discount rate.
- the lease payments change due to changes in an index or rate or a change in expected payment under a guaranteed residual value, in which cases the lease liability is remeasured by discounting the revised lease payments using the initial discount rate (unless the lease payments change is due to a change in a floating interest rate, in which case a revised discount rate is used).
- a lease contract is modified and the lease modification is not accounted for as a separate lease, in which case the lease liability is remeasured by discounting the revised lease payments using a revised discount rate at the effective date of the modification.

The Company did not make any such adjustments during the periods presented.

The right of use assets include the initial measurement of the corresponding lease obligation, lease payments made before or before the lease actually starts, and other direct initial costs. These assets are subsequently measured at cost by deducting accumulated depreciation and impairment losses.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.5 Leases (cont'd)

The Company as lessee (cont'd)

The Company applies TAS 36 to determine whether a right-of-use asset is impaired and accounts for any identified impairment loss as described in the 'Property, Plant and Equipment' policy. Variable rents that do not depend on an index or rate are not included in the measurement of the lease liability and the right-of-use asset. These costs are included in the relevant use right asset, unless they are incurred for stock production.

Right-of-use assets are depreciated over the shorter period of lease term and useful life of the underlying asset. If a lease transfers ownership of the underlying asset or the cost of the right-of-use asset reflects that the Company expects to exercise a purchase option, the related right-of-use asset is depreciated over the useful life of the underlying asset. The depreciation starts at the commencement date of the lease.

The right-of-use assets are presented as a separate line in the statement of financial position. (Note 15).

The Company as lessor

Leases for which the Company is a lessor are classified as finance or operating leases. Whenever the terms of the lease transfer substantially all the risks and rewards of ownership to the lessee, the contract is classified as a finance lease. All other leases are classified as operating leases.

If the Company is in the position of sub-lease, the main lease and sub-lease are recognized as two separate contracts. Sub-lease is classified as financial lease or operating lease regarding the right to use arising from the main lease.

Rental income from operating leases is recognised on a straight-line basis over the term of the relevant lease. Initial direct costs incurred in negotiating and arranging an operating lease are added to the carrying amount of the leased asset and recognised on a straight-line basis over the lease term.

Amounts due from lessees under finance leases are recognised as receivables at the amount of the Company's net investment in the leases.

2.7.6 Impairment of assets

Assets subject to depreciation and amortization are tested for impairment when events or changes in circumstances indicate the carrying value may not be recoverable. An impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the greater of net selling price and value in use. Recoverable amounts are estimated for individual assets (for the cash-generating unit). Non-financial assets that are impaired are evaluated for reversal of impairment amount at each reporting date.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.7 Borrowing costs

Borrowing costs that are directly attributable to the acquisition, construction or production of qualifying assets, one that takes a substantial period of time to get ready for use or sale, are capitalized as part of the cost of that asset in the period in which the asset is prepared for its intended use or sale. Investment revenues arising from the temporary utilization of the unused portion of facility loans are netted off from the costs eligible for capitalization.

All other borrowing costs are recognized directly in the income statement of the period in which they are incurred.

2.7.8 Financial Instruments

Financial assets and financial liabilities are recognised in the Company's statement of financial position when the Company becomes a party to the contractual provisions of the instrument. Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognised immediately in profit or loss.

Financial assets

All regular way purchases or sales of financial assets are recognised and derecognised on a trade date basis.

The Company classifies its financial assets as (a) Business model used for managing financial assets, (b) financial assets subsequently measured at amortised cost, at fair value through other comprehensive income or at fair value through profit or loss based on the characteristics of contractual cash flows. The Company reclassifies all financial assets effected from the change in the business model it uses for the management of financial assets. The reclassification of financial assets is applied prospectively from the reclassification date. In such cases, no adjustment is made to gains, losses (including any gains or losses of impairment) or interest previously recognized in the financial statements.

Classification of financial assets

Debt instruments that meet the following conditions are measured subsequently at amortised cost:

- the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Debt instruments that meet the following conditions are measured subsequently at fair value through other comprehensive income (FVTOCI):

- the financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial assets; and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

By default, all other financial assets are measured subsequently at fair value through profit or loss (FVTPL).

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.8 Financial Instruments (cont'd)

Financial assets (cont'd)

Despite the foregoing, the Company may make the following irrevocable election/designation at initial recognition of a financial asset; the Company may irrevocably elect to present subsequent changes in fair value of an equity investment in other comprehensive income if certain criteria are met.

(i) Amortised cost and effective interest method

Interest income on financial assets carried at amortized cost is calculated using the effective interest method. The effective interest method is a method of calculating the amortised cost of a debt instrument and of allocating interest income over the relevant period. This income is calculated by applying the effective interest rate to the gross carrying amount of the financial asset:

- a) Credit-impaired financial assets when purchased or generated. For such financial assets, the Company applies the effective interest rate on the amortized cost of a financial asset based on the loan from the date of the recognition in the financial statements.
- b) Non-financial assets that are impaired at the time of acquisition or generation but subsequently become a financial asset that has been impaired. For such financial assets, the Company applies the effective interest rate to the amortized cost of the asset in the subsequent reporting periods.

Interest income is recognised using the effective interest method for debt instruments measured subsequently at amortised cost and at FVTOCI.

Interest income is recognised in profit or loss and is included in the "finance income – interest income" line item (Note 28).

(ii) Financial assets at FVTPL

Financial assets that do not meet the criteria for being measured at amortised cost or FVTOCI are measured at FVTPL.

Financial assets at FVTPL are measured at fair value at the end of each reporting period, with any fair value gains or losses recognised in profit or loss to the extent they are not part of a designated hedging relationship.

Foreign exchange gains and losses

The carrying amount of financial assets that are denominated in a foreign currency is determined in that foreign currency and translated at the spot rate at the end of each reporting period. Specifically,

- for financial assets measured at amortised cost that are not part of a designated hedging relationship, exchange differences are recognised in profit or loss in the 'other gains and losses' line item;
- for debt instruments measured at FVTOCI that are not part of a designated hedging relationship, exchange differences on the amortised cost of the debt instrument are recognised in profit or loss in the 'other gains and losses' line item. Other exchange differences are recognised in other comprehensive income in the investments revaluation reserve;
- for financial assets measured at FVTPL that are not part of a designated hedging relationship, exchange differences are recognised in profit or loss in the 'other gains and losses' line item (and
- for equity instruments measured at FVTOCI, exchange differences are recognised in other comprehensive income in the investments revaluation reserve.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.8 Financial Instruments (cont'd)

Financial assets (cont'd)

Impairment of financial assets

The Company recognises a loss allowance for expected credit losses on investments in debt instruments that are measured at amortised cost or at FVTOCI, lease receivables, trade receivables and contract assets, as well as financial guarantee contracts. No impairment loss is recognised for investments in equity instruments. The amount of expected credit losses is updated at each reporting date to reflect changes in credit risk since initial recognition of the respective financial instrument.

The Company utilizes a simplified approach for trade receivables, contract assets and lease receivables that does not have significant financing component and calculates the allowance for impairment against the lifetime ECL of the related financial assets.

For all other financial instruments, the Company recognises lifetime ECL when there has been a significant increase in credit risk since initial recognition. However, if on the other hand, the credit risk on the financial instrument has not increased significantly since initial recognition, the Company measures the loss allowance for that financial instrument at an amount equal to 12-month ECL.

Measurement and recognition of expected credit losses

The measurement of expected credit losses is a function of the probability of default, loss given default (i.e. the magnitude of the loss if there is a default) and the exposure at default. The assessment of the probability of default and loss given default is based on historical data adjusted by forward-looking information as described above. As for the exposure at default, for financial assets, this is represented by the assets' gross carrying amount at the reporting date.

For financial assets, the expected credit loss is estimated as the difference between all contractual cash flows that are due to the Company in accordance with the contract and all the cash flows that the Company expects to receive, discounted at the original effective interest rate.

Derecognition of financial assets

The Company derecognises a financial asset only when the contractual rights to the cash flows from the asset expire, or when it transfers the financial asset and substantially all the risks and rewards of ownership of the asset to another entity.

On derecognition of a financial asset measured at amortised cost, the difference between the asset's carrying amount and the sum of the consideration received and receivable is recognised in profit or loss. In addition, on derecognition of an investment in a debt instrument classified as at FVTOCI, the cumulative gain or loss previously accumulated in the investments revaluation reserve is reclassified to profit or loss. In contrast, on derecognition of an investment in equity instrument which the Company has elected on initial recognition to measure at FVTOCI, the cumulative gain or loss previously accumulated in the investments revaluation reserve is not reclassified to profit or loss, but is transferred to retained earnings.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.8 Financial Instruments (cont'd)

Financial liabilities

Financial liabilities are classified as at FVTPL on initial recognition. On initial recognition of liabilities other than those that are recognised at FVTPL, transaction costs directly attributable to the acquisition or issuance thereof are also recognised in the fair value.

A financial liability is subsequently classified at amortized cost except:

- a) Financial liabilities at FVTPL: These liabilities including derivative instruments are subsequently measured at fair value.
- b) Financial liabilities arising if the transfer of the financial asset does not meet the conditions of derecognition from the financial statements or if the ongoing relationship approach is applied: When the Company continues to present an asset based on the ongoing relationship approach, a liability in relation to this is also recognised in the financial statements. The transferred asset and the related liability are measured to reflect the rights and liabilities that the Company continues to hold. The transferred liability is measured in the same manner as the net book value of the transferred asset.
- c) A contingent consideration recognized in the financial statements by the entity acquired in a business combination where TFRS 3 is applied: After initial recognition, the related contingent consideration is measured as at FVTPL.

The Company does not reclassify any financial liability.

Derecognition of financial liabilities

The Company derecognises financial liabilities when, and only when, the Company's obligations are discharged, cancelled or have expired. The difference between the carrying amount of the financial liability derecognised and the consideration paid and payable, including any non-cash assets transferred or liabilities assumed, is recognised in profit or loss.

Derivative financial instruments

The Company enters into a variety of derivative financial instruments to manage its exposure to interest rate and foreign exchange rate risks, including foreign exchange forward contracts, options and interest rate swaps. Further details of derivative financial instruments are disclosed in Note 7.

Derivatives are recognised initially at fair value at the date a derivative contract is entered into and are subsequently remeasured to their fair value at each reporting date. The resulting gain or loss is recognised in profit or loss immediately unless the derivative is designated and effective as a hedging instrument, in which event the timing of the recognition in profit or loss depends on the nature of the hedge relationship.

A derivative with a positive fair value is recognised as a financial asset whereas a derivative with a negative fair value is recognised as a financial liability. Derivatives are not offset in the financial statements unless the Company has both legal right and intention to offset. A derivative is presented as a non-current asset or a non-current liability if the remaining maturity of the instrument is more than 12 months and it is not expected to be realised or settled within 12 months. Other derivatives are presented as current assets or current liabilities.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.8 Financial Instruments (cont'd)

Hedge accounting

The Company designates certain derivatives as hedging instruments in respect of foreign currency risk and interest rate risk in fair value hedges, cash flow hedges, or hedges of net investments in foreign operations as appropriate. Hedges of foreign exchange risk on firm commitments are accounted for as cash flow hedges.

At the inception of the hedge relationship, the Company documents the relationship between the hedging instrument and the hedged item, along with its risk management objectives and its strategy for undertaking various hedge transactions. Furthermore, at the inception of the hedge and on an ongoing basis, the Company documents whether the hedging instrument is effective in offsetting changes in fair values or cash flows of the hedged item attributable to the hedged risk, which is when the hedging relationships meet all of the following hedge effectiveness requirements:

- there is an economic relationship between the hedged item and the hedging instrument;
- the effect of credit risk does not dominate the value changes that result from that economic relationship; and
- the hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the Company actually hedges and the quantity of the hedging instrument that the entity actually uses to hedge that quantity of hedged item.

If a hedging relationship ceases to meet the hedge effectiveness requirement relating to the hedge ratio but the risk management objective for that designated hedging relationship remains the same, the Company adjusts the hedge ratio of the hedging relationship (i.e. rebalances the hedge).

The Company designates the full change in the fair value of a forward contract (i.e. including the forward elements) as the hedging instrument for all of its hedging relationships involving forward contracts.

Note 7 sets out details of the fair values of the derivative instruments used for hedging purposes.

2.7.9 The effects of foreign exchange rate changes

Foreign currency transactions are recorded at the rates of exchange prevailing on the dates of the transactions. The Company' financial conditions and performance results stated as Turkish Lira in presentation currency in financial statements

The Company records foreign currency (currencies other than the functional currency of the related company) transactions using exchange rates of the date the transaction is completed. Foreign currency monetary items are evaluated with exchange rates as of reporting date and arising foreign exchange income/expenses are recorded in statement of income. All monetary assets and liabilities are evaluated with exchange rates of the reporting date and related foreign currency translation differences are transferred to statement of income. Non-monetary foreign currency items that are recognized at cost are evaluated with historic exchange rates. Non-monetary foreign currency items that are recognized at fair value are evaluated with exchange rates of the dates their fair values are determined.

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NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.10 Subsequent events

Subsequent events include all events that take place between the balance sheet date and the date of authorization for the release of the balance sheet, although the events occurred after the announcements related to the net profit/loss or even after the public disclosure of other selective financial information.

In the case that events occur requiring an adjustment, the Company adjusts the amounts recognized in its financial statements to reflect the adjustments after the balance sheet date. Post period end events that are not adjusting events are disclosed in the notes when material.

2.7.11 Provisions, contingent liabilities and contingent assets

Provisions are recognized when the Company has a present obligation as a result of a past legal or subtle event, where it is probable that the Company will be required to settle that obligation and when a reliable estimate can be made of the amount of the obligation. Contingent liabilities are assessed continuously to determine the probability of outflow of the economically beneficial assets. For contingent liabilities, when an outflow of resources embodying economic benefits are probable, provision is recognized for this contingent liability in the period when the probability has changed, except for the cases where a reliable estimate cannot be made.

When the Company's contingent liabilities' availability is possible but the amount of resources containing the economic benefits cannot be measured reliably, then the Company discloses this fact in the notes.

2.7.12 Related parties

A related party is a person or entity that is related to reporting entity, the entity that is preparing its financial statements.

- (a) A person or a close member of that person's family is related to a reporting entity if that person:
 - (i) has control or joint control over the reporting entity;
 - (ii) has significant influence over the reporting entity; or
 - (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.
- (b) An entity is related to a reporting entity if any of the following conditions applies:
 - (i) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
 - (ii) One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
 - (iii) Both entities are joint ventures of the same third party.
 - (iv) One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
 - (v) The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
 - (vi) The entity is controlled or jointly controlled by a person identified in (a).
 - (vii) A person identified in (a)(i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

A related party transaction is a transfer of resources, services or obligations between a reporting entity and a related party, regardless of whether a price is charged.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.13 Taxation and deferred income taxes

Income tax expense represents the sum of the current tax and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from profit as reported in the income statement because it excludes items of income or expense that are taxable or deductible in future and it further excludes items that are never taxable or deductible. The Company's liability for current tax is calculated using tax rates that have been enacted or substantively enacted by the balance sheet date.

Deferred tax

Deferred tax is determined by calculating the temporary differences between the carrying amounts of assets/liabilities in the financial statements and the corresponding tax bases, used in the computation of the taxable profit, using currently enacted tax rates.

Deferred tax liabilities are generally recognized for all taxable temporary differences where deferred tax assets resulting from deductible temporary differences are recognized to the extent that it is probable that future taxable profit will be available against which the deductible temporary difference can be utilized. Such assets and liabilities are not recognized if the temporary difference arises from goodwill or from the initial recognition (other than in a business combination) of other assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit.

Deferred tax liabilities are recognized for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the Company is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax assets arising from deductible temporary differences associated with such investments and interests are only recognized if it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date.

The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Company expects, at the reporting date, to recover or settle the carrying amount of its assets and liabilities.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to set off current tax assets against current tax liabilities and when they relate to income taxes levied by the same taxation authority and the Company intends to settle its current tax assets and liabilities on a net basis.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.13 Taxation and deferred income taxes (cont'd)

Current and deferred tax for the period

Current and deferred tax are recognized as an expense or income in the income statement, except when they relate to the items credited or debited directly to the equity (in this case the deferred tax related to these items is also recognized directly in the equity), or where they arise from the initial accounting of a business combination. In the case of a business combination, the tax effect is taken into account in calculating goodwill or determining the excess of the acquirer's interest in the net fair value of the acquiree's identifiable assets, liabilities and contingent liabilities over cost.

2.7.14 Employee benefits

According to the Turkish law and union agreements, employee termination payments are made to employees in the case of retiring or involuntarily leaving. Such payments are considered as a part of defined retirement benefit plan in accordance with TAS19 (revised) *Employee Benefits* ("TAS 19").

The termination indemnities accounted in the balance sheet and seniority incentive premium in accordance with the union agreements in force represent the present value of the residual obligation. Actuarial gains and losses, on the other hand, are recognized in the statement of other comprehensive income.

The Company makes certain assumptions about discount rates, inflation rates, future salary increases and employee turnover rates in calculation of provisions for employee benefits. The present value of employee benefits is calculated by an independent actuary and some changes are done in accounting assumptions used in calculations. The impact of the changes in assumptions is recognized in the statement of income. The details related with the defined benefit plans are stated in Note 17.

Liabilities due to unused vacations classified as provisions due to employee benefits are accrued and discounted if the discount effect is material.

The Company is required to pay social insurance premiums to the Social Security Agency. As long as it pays these insurance premiums, the Company does not have any further obligation. These premiums are reflected in the payroll expenses incurred in the period.

2.7.15 Government grants and incentives

Government grants and incentives are recognized at fair value when there is assurance that these grants and incentives will be received and the Company has met all conditions required. Government grants and incentives related to costs are recognized as revenue during the periods they are matched with the costs they will cover.

2.7.16 Statement of cash flows

Cash flows during the period are classified and reported as operating, investing and financing activities in the statement of cash flows.

Cash flows arising from operating activities represent the cash flows that are used in or provided by the Company's steel products sales activities.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 2 – BASIS OF PRESENTATION OF THE FINANCIAL STATEMENTS (cont'd)

2.7 Valuation Principles Applied / Significant Accounting Policies (cont'd)

2.7.16 Statement of cash flows (cont'd)

Cash flows arising from investment activities represent the cash flows that are used in or provided by the investing activities (direct investments and financial investments) of the Company.

Cash flows arising from financing activities represent the cash proceeds from the financing activities of the Company and the repayments of these funds.

Cash and cash equivalents comprises of the cash on hand, the demand deposits and highly liquid other short-term investments which their maturities are three months or less from the date of acquisition, are readily convertible to cash and are not subject to a significant risk of changes in value.

The translation difference that occurs due to translation from functional currency to presentation currency is shown as translation difference on cash flow statement.

2.7.17 Share capital and dividends

Common shares are classified as equity. Dividends on common shares are recognized in equity in the period which they are approved and declared.

2.7.18 Earnings per share

Earnings per share, disclosed in the statement of profit or loss, are determined by dividing the net income attributable to equity holders of the parent by the weighted average number of shares outstanding during the period concerned.

In Turkey, companies can increase their share capital by distributing "bonus shares" to shareholders from retained earnings. In computing earnings per share, such "bonus share" distributions are assessed as issued shares. Accordingly, the weighted-average number of shares are computed by taking into consideration of the retrospective effects of the share distributions.

2.7.19 Significant changes in current period

The Company management took the necessary actions to minimize the impacts of COVID-19 pandemic on the Company's operations and financial position. The manufacturing activities of the Company were not suspended during the lockdowns.

In the preparations of the financial statements as at 31 December 2021, the Company assessed the possible impacts of COVID-19 pandemic on the financial statements and reviewed the critical estimates and assumptions used in the preparation of the financial statements. Within this scope, the Company evaluated the trade receivables, inventories, property, plant and equipment and investment properties included in the financial statements as at 31 December 2021 for any possible impairment but no impairment were identified.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 3 – SEGMENTAL REPORTING

The segments with similar economic characteristics have been combined into a single operating segment considering the nature of the products and the production processes, methods to allocate the products and the type of customers or to provide services.

NOTE 4 – CASH AND CASH EQUIVALENTS

The detail of cash and cash equivalents as of reporting period is as follows:

	31 December 2021	31 December 2020
Banks – demand deposits	33.180	38.603
Banks – time deposits	8.791.388	-
	8.824.568	38.603
Time deposit interest accruals (-)	(45.108)	-
	8.779.460	38.603
The breakdown of demand deposits is presented below:		
	31 December 2021	31 December 2020
US Dollars	2.982	1.236
TRY	28.391	37.210
EURO	1.711	91
GB Pound	28	15
Other	68	51
	33.180	38.603
The breakdown of time deposits is presented below:		
	31 December	31 December
, 	2021	2020
US Dollars	2.975.696	-
TRY	4.565.586	-
EURO	1.250.106	-
_	8.791.388	

Bank deposits consist of amounts with maturities ranging from 1 day to 3 months depending on the cash needs of the Company, and interest is calculated for these deposits depending on the short-term interest rates in the market.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 5 – FINANCIAL INVESTMENTS

As of reporting date the detail of long term financial investments as follows:

	31 December	31 December
	2021	2020
Fair value change reflected in profit or loss	361	199
	361	199

As of reporting period, ratios and amounts of subsidiaries of the Company are as followings:

	Ratio	31 December	Ratio	31 December
Company	%	2021	%	2020
Financial investments without an active market				
Teknopark Hatay A.Ş.	5	361	5	199
		361		199

NOTE 6 – INVESTMETS ACCOUNTED FOR USING EQUITY METHOD

The detail of the investments accounted for using equity method is follows:

	Right to	31 December	Right to	31 December	Business
Join Venture	vote ratio %	2021	vote ratio %	2020	segment
İsdemir Linde Gaz Ortaklığı A.Ş.	50	370.292	50	229.956	Industrial Gas
isdeniii Linde Gaz Ortakiigi A.Ş.	30	370.292	30	229.930	Production and Sale

Company's share on net assets of investments accounted for using equity method is follows:

	31 December 2021	31 December 2020
Total assets	778.957	492.495
Total liabilities	38.373	32.584
Net assets	740.584	459.911
Company's share on net assets	370.292	229.956

At the Ordinary General Assembly Meeting of İsdemir Linde Gaz Ortaklığı A.Ş., dated 25 February 2021, decisions regarding the distribution of cash dividend of TRY 12.784 thousand (its effect in the cash flows of Isdemir is TRY 6.392 thousand) from the net profit of 2020 have been unanimously approved. The dividend payment was completed at 12 March 2021.

31 December	31 December
2021	2020
140.000	175.000
	2021

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 6 - INVESTMETS ACCOUNTED FOR USING EQUITY METHOD (cont'd)

It has been decided to reduce the Company's fully paid-in capital amounting to TL 175.000 thousand to TL 140.000 thousand by reducing the amount of TL 35.000 thousand. The payment for the capital reduction has been completed on 12 October 2021.

İsdemir Linde Gaz Ortaklığı A.Ş has the right of to deduct TRY 132.460 thousand (31 December 2020: TRY 97.254 thousand) from corporate tax of the investment deduction where profit will occur in the upcoming years pursuant to the Resolution No 2012/3305 on Government Aids in Investments and the Cabinet Decision issued in the Official gazette on 22 February 2017. The deferred tax asset of TRY 35.206 thousand of additional investment deduction (its effect in the profit or loss statement of Company is TRY 17.603 thousand) is included in the financial statements prepared as of reporting date.

Company's share on profit of investments accounted for using equity method is as follows:

	31 December 2021	31 December 2020
Revenue	166.202	123.827
Operating Profit	37.665	28.909
Net profit (loss) for the period	(11.484)	15.369
Company's share on net profit	(5.742)	7.685

NOTE 7 – FINANCIAL DERIVATIVE INSTRUMENTS

The detail of financial derivative instruments as of reporting period is as follows:

	31 December 2021		31 Decer	mber 2020
	Asset	Liability	Asset	Liability
Fair value hedging derivative financial assets				
Forward contracts for fair value hedges of currency risk of sales	40.847	-	-	-
Forward contracts		3.093		
	40.847	3.093		-
Cash flow hedging derivative financial assets				
Forward contracts for cash flow hedges of currency				
risk of sales	13.939			
	13.939			
	54.786	3.093		-

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 7 – FINANCIAL DERIVATIVE INSTRUMENTS (cont'd)

Derivative instruments for fair value hedge

As of 31 December 2021, the details of swap transactions for fair value hedge are as follows:

		Assets		Labilities	
31 December 2021		Nominal value	Fair value	Nominal value	Fair value
Forward contracts for sales					
Buy USD/Sell EUR	Less than 3 months	843.646	40.847		
			40.847	-	-
		843.646			
Forward contracts					
Buy EUR/Sell USD	Less than 3 months	-	-	112.094	3.093
				112.094	3.093
		843.646	40.847	112.094	3.093

Cash flow hedging derivative financial assets

The Company's US Dollar purchase - EURO sales forward contracts, whose fair values are recognized in the other comprehensive income statement, are associated with the parity risk that will occur regarding the sales made in EURO. The sales contracts of these sales transactions have been finalized and their maturities vary between January 2022 and March 2022. Based on these transactions with a nominal value of TRY 332.248 thousand, for the purpose of hedging the cash flow risk, TRY 13.939 thousand, excluding the deferred tax effect, has been accounted for in the statement of other comprehensive income (31 December 2020: None). In the current period, TRY 41.570 thousand arising from forward contracts regarding sales has been recognized in the revenue account of the profit or loss statement.

NOTE 8 – BORROWINGS

As of the balance sheet date, the details of the Company's borrowings are as follows:

	31 December 2021	31 December 2020
Short term bank borrowings	2.022.735	48.544
Short term portion of long term bank borrowings	741.499	129.998
Long term bank borrowings	2.016.952	785.769
Total bank borrowings	4.781.186	964.311
Current portion of long term lease payables Cost of current portion of long term lease payables (-) Long term lease payables Cost of long term lease payables (-)	39.542 (1.891) 945.836 (711.852)	31.821 (1.485) 857.949 (656.916)
Total leases borrowings	271.635	231.369
Total borrowings	5.052.821	1.195.680

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 8 – BORROWINGS (cont'd)

As of 31 December 2021, the breakdown of the Company's loans with their original currency and their weighted average interest rates is presented as follows:

Interest Type	Type of Currency	Weight Average Rate of Interest (%)	Short Term Portion	Long Term Portion	31 December 2021
Fixed	US Dollars	1,29	2.469.539	-	2.469.539
Floating	US Dollars	Libor+2,12	3.265	1.253.168	1.256.433
No interest	TRY	-	18.615	-	18.615
Floating	EURO	Euribor+1,01	272.815	763.784	1.036.599
		_	2.764.234	2.016.952	4.781.186

As of 31 December 2020, the breakdown of the Company's loans with their original currency and their weighted average interest rates is presented as follows:

Interest	Type of	Weight Average Rate	Short Term	Long Term	31 December
Type	Currency	of Interest (%)	Portion	Portion	2020
Fixed	US Dollars	1,76	-	251.229	251.229
Fixed	TRY	7,25	48.544	-	48.544
Floating	EURO	Euribor+1,28	129.998	534.540	664.538
			178.542	785.769	964.311

The breakdown of loan repayment is as follows:

	31 December 2021			31	December 20)20
	Financial Lease Total		Financial	Lease	Total	
	liabilities	liabilities	liabilities	liabilities	liabilities	liabilities
Within 1 year	2.764.234	37.651	2.801.885	178.542	30.336	208.878
Between 1-2 years	191.768	34.180	225.948	399.421	25.529	424.950
Between 2-3 years	786.131	28.667	814.798	101.188	23.601	124.789
Between 3-4 years	138.300	23.211	161.511	39.786	20.436	60.222
Between 4-5 years	176.912	20.173	197.085	39.786	17.761	57.547
Five years or more	723.841	127.753	851.594	205.588	113.706	319.294
	4.781.186	271.635	5.052.821	964.311	231.369	1.195.680
			_	-		

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 8 - BORROWINGS (cont'd)

Reconciliation of net financial borrowings as of reporting period is as follows:

	31 December 2021	31 December 2020
Opening balance	964.311	1.616.319
Interest expenses	62.221	43.193
Interest paid	(33.751)	(40.645)
Unrealised foreign exchange differences	(106.510)	28.767
Cash inflow from loans	2.759.036	1.789.535
Capitalized finance expense	11.861	13.549
Cash outflow from loan repayment	(776.469)	(2.821.458)
Translation reserves	1.900.487	335.051
	4.781.186	964.311

Net financial debt reconciliation of debts from leasing transactions is as follows:

	1 January - 31 December 2021	1 January - 31 December 2020
Opening balance	231.369	203.317
The effect of the increase in the lease contract liability	41.411	28.420
Cash outflow effect	(36.953)	(32.825)
Increase in interest expenses	33.266	31.101
Exchange rate effect	2.542	1.356
Closing balance	271.635	231.369

NOTE 9 – TRADE RECEIVABLES AND PAYABLES

As of the balance sheet date, the details of the Company's trade receivables are as follows:

	31 December 2021	31 December 2020
Short term trade receivables		
Trade receivables	1.152.134	291.736
Due from related parties (Note 32)	1.619.882	992.977
Provision for doubtful trade receivables (-)	(5.871)	(3.509)
	2.766.145	1.281.204

The movements in the short-term expected credit loss provision are as follows:

	1 January-	1 January-
	31 December 2021	31 December 2020
Opening balance	3.509	2.984
Provision for the period	109	214
Doubtful receivables collected (-)	(192)	(289)
Translation difference	2.445	600
Closing balance	5.871	3.509

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 9 – TRADE RECEIVABLES AND PAYABLES (cont'd)

Trade receivables consist of receivables from the customer for products sold in normal work flow. The term of trade receivables is 45 to 50 days on average, and is classified as short-term trade receivables. The Company holds its trade receivables in order to collect the cash flows arising from the contract and therefore, measures the amortized cost by using the effective interest method.

According to the market conditions and product types, a certain interest charge is applied for deferred trade receivables and overdue interest is applied for overdue trade receivables.

As the Company provides services and products to a large number of customers, collection risk is widely distributed amongst these customers and there is no significant credit risk exposure. Therefore, the Company does not provide for any further provision beyond the doubtful receivables provisions that the Company has already provided for in the financial statements.

The detail of overdue receivables included in trade receivables as of the reporting date is disclosed in the management of credit risk management Note 33.

As of the balance sheet date, there are no significant receivables in trade receivables past due. The Company provides provision according to the balances of all unsecured receivables under legal follow up.

In accordance with the "TFRS 9 Financial Instruments" standard, expected credit losses related to trade receivables were measured, but expected credit loss provisions did not have a significant impact on the financial statements.

As of the balance sheet date, the details of the Company's trade payables are as follows:

Short term trade payables	31 December 2021	31 December 2020
Trade payables	2.705.772	1.466.328
Due to related parties (Note 32)	435.475	384.960
	3.141.247	1.851.288

Trade payables consist of payables to sellers for products or services purchased in the normal workflow. The average repayment period of commercial debts is approximately 35-40 days.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 10 - OTHER RECEIVABLES AND PAYABLES

As of the balance sheet date, the details of the Company's other receivables and payables are as follows:

	31 December	31 December
Short term other receivables	2021	2020
Other receivables from related parties (Note 32)	21.225	6.879.919
Receivables from water system construction	1.351	1.471
Receivables from Privatization Authority	37.795	33.367
Deposits and guarantees given	347	121
	60.718	6.914.878
	31 December	31 December
Long term other receivables	2021	2020
Receivables from water system construction	5.900	10.193
	5.900	10.193

The movement of the provision for long term other doubtful receivables are as follows:

	31 December	31 December
Short term other payables	2021	2020
Taxes payable	56.909	18.855
Deposits and guarantees received	13.841	12.130
Dividend payables to shareholders (*)	7.057	4.015
	77.807	35.000

^(*) Dividend payable represents the uncollected balances by shareholders.

NOTE 11 – INVENTORIES

As of the balance sheet date, the details of the Company's inventories are as follows:

31 December 2021	31 December 2020
4.564.939	1.436.403
3.568.046	825.626
1.527.976	402.557
1.260.562	631.992
2.681.929	1.119.449
692.917	385.921
(377.367)	(211.305)
13.919.002	4.590.643
	2021 4.564.939 3.568.046 1.527.976 1.260.562 2.681.929 692.917 (377.367)

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 11 – INVENTORIES (cont'd)

The movement of the allowance for impairment on inventories:

	1 January –	1 January –
	31 December 2021	31 December 2020
Opening balance	211.305	160.828
Provision for the period	-	15.805
Provision released (-)	(4.011)	(3.813)
Translation difference	170.073	38.485
Closing balance	377.367	211.305

The Company has provided an allowance for the impairment on the inventories of finished goods, work in progress and raw materials within the scope of aging reports in the cases when their net realizable values are lower than their costs or for slow moving inventories. The provision released has been recognized under cost of sales (Note 23).

NOTE 12 – PREPAID EXPENSES

As of the balance sheet date, the details of the Company's short term prepaid expenses are as follows:

2020
2.552
1.168
2.617
3.817
0.154

As of the balance sheet date, the details of the Company's long term prepaid expenses are as follows:

	31 December 2021	31 December 2020
Order advances given	773.943	566.094
Due to related parties (Note 32)	44.650	12.868
Other order advances given	729.293	553.226
Insurance expenses	106.732	54.852
	880.675	620.946

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 13 - PROPERTY, PLANT AND EQUIPMENT

The details of the Company's tangible assets as of the reporting period are as follows:

							Other		
							Property,	Construction	
		Land		Machinery and		Furniture and	Plant and	in Progress	
	Land	Improvements	Buildings	equipment	Vehicles	Fixtures	Equipment	(CIP)	Total
Cost									
Opening balance as of 1 January 2021	223.448	4.831.855	5.452.063	20.035.804	1.804.949	837.672	55.324	1.288.912	34.530.027
Translation difference	183.266	3.983.635	4.504.865	16.399.648	1.486.274	691.455	49.728	2.098.890	29.397.761
Additions (*)	1.687	1.443	-	106.888	7.895	14.708	2.562	2.137.659	2.272.842
Transfers from CIP (**)	-	70.917	99.390	114.617	19.288	3.372	642	(321.526)	(13.300)
Disposals	<u> </u>	<u>-</u> _	(585)	(127.679)	(3.309)	(4.088)	(63)	<u>-</u>	(135.724)
Closing balance as of 31 December 2021	408.401	8.887.850	10.055.733	36.529.278	3.315.097	1.543.119	108.193	5.203.935	66.051.606
Accumulated Depreciation									
Opening balance as of 1 January 2021	-	(3.735.663)	(3.837.436)	(11.454.804)	(1.005.389)	(434.027)	(49.971)	(83.473)	(20.600.763)
Translation difference	-	(3.109.608)	(3.207.216)	(9.614.300)	(856.529)	(374.375)	(45.324)	(68.099)	(17.275.451)
Charge for the period	-	(107.500)	(133.171)	(592.298)	(66.020)	(38.862)	(3.142)	-	(940.993)
Disposals	<u> </u>	<u>-</u> _	398	125.363	3.044	3.682	63	<u>-</u> _	132.550
Closing balance as of 31 December 2021		(6.952.771)	(7.177.425)	(21.536.039)	(1.924.894)	(843.582)	(98.374)	(151.572)	(38.684.657)
Net book value as of 31 December 2020	223.448	1.096.192	1.614.627	8.581.000	799.560	403.645	5.353	1.205.439	13.929.264
Net book value as of 31 December 2021	408.401	1.935.079	2.878.308	14.993.239	1.390.203	699.537	9.819	5.052.363	27.366.949

Other

As of 31 December 2021, the Company has no collaterals or pledges on tangible assets.

^(*) The amount of capitalized borrowing cost is TRY 11.861 thousand for the current period.

^(**) TRY 13.300 thousand is transferred to intangible assets (Note 14).

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 13 - PROPERTY, PLANT AND EQUIPMENT (cont'd)

							Other	_	
							Property,	Construction	
		Land		Machinery and		Furniture and	Plant and	in Progress	
	Land	Improvements	Buildings	equipment	Vehicles	Fixtures	Equipment	(CIP)	Total
Cost									
Opening balance as of 1 January 2020	178.488	3.878.626	4.406.497	16.069.273	1.459.032	670.633	42.482	383.579	27.088.610
Translation difference	42.207	916.095	1.039.067	3.796.200	344.031	158.499	10.911	127.612	6.434.622
Additions (*)	16.630	896	45	44.087	380	9.149	1.141	1.008.636	1.080.964
Transfers from CIP (**)	-	36.281	7.311	175.943	6.117	1.783	849	(230.915)	(2.631)
Disposals	(13.877)	(43)	(857)	(49.699)	(4.611)	(2.392)	(59)	_	(71.538)
Closing balance as of 31 December 2020	223.448	4.831.855	5.452.063	20.035.804	1.804.949	837.672	55.324	1.288.912	34.530.027
Accumulated Depreciation									
Opening balance as of 1 January 2020	-	(2.955.206)	(3.013.331)	(8.909.636)	(775.093)	(328.992)	(37.567)	(67.549)	(16.087.374)
Translation difference	-	(700.465)	(715.532)	(2.120.597)	(184.885)	(78.809)	(9.786)	(15.924)	(3.825.998)
Charge for the period	-	(80.032)	(109.425)	(468.645)	(50.022)	(28.419)	(2.677)	-	(739.220)
Disposals	-	40	852	44.074	4.611	2.193	59	-	51.829
Closing balance as of 31 December 2020	-	(3.735.663)	(3.837.436)	(11.454.804)	(1.005.389)	(434.027)	(49.971)	(83.473)	(20.600.763)
Net book value as of 31 December 2019	178.488	923.420	1.393.166	7.159.637	683.939	341.641	4.915	316.030	11.001.236
Net book value as of 31 December 2020	223.448	1.096.192	1.614.627	8.581.000	799.560	403.645	5.353	1.205.439	13.929.264

^(*) The amount of capitalized borrowing cost is TRY 13.549 thousand for the current period.

As of 31 December 2020, the Company has no collaterals or pledges on tangible assets.

^(**) TRY 2.631 thousand is transferred to intangible assets (Note 14).

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 13 - PROPERTY, PLANT AND EQUIPMENT (cont'd)

The breakdown of depreciation expenses related to property, plant and equipment is as follows:

	31 December	31 December
	2021	2020
Associated with cost of production	898.996	713.057
General administrative expenses	5.378	4.344
Marketing, sales and distribution expenses	36.619	21.819
	940.993	739.220

NOTE 14 – INTANGIBLE ASSETS

As of the balance sheet date, the details of the Company's intagible assets are as follows:

	Rights	Total
Cost		
Opening balance as of 1 January 2021	578.179	578.179
Translation difference	482.291	482.291
Additions	5.084	5.084
Transfers from CIP	13.300	13.300
Disposals	(5)	(5)
Closing balance as of 31 December 2021	1.078.849	1.078.849
Accumulated amortization		
Opening balance as of 1 January 2021	(274.736)	(274.736)
Translation difference	(235.257)	(235.257)
Charge for the period	(19.288)	(19.288)
Disposals	2	2
Closing balance as of 31 December 2021	(529.279)	(529.279)
Net book value as of 31 December 2020	303.443	303.443
Net book value as of 31 December 2021	549.570	549.570

As of 31 December 2021, the Company has no collaterals or pledges on intangible assets.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

_	Rights	Total
Cost		
Opening balance as of 1 January 2020	459.313	459.313
Translation difference	108.759	108.759
Additions	7.476	7.476
Transfers from CIP	2.631	2.631
Closing balance as of 31 December 2020	578.179	578.179
Accumulated amortization		
Opening balance as of 1 January 2020	(207.865)	(207.865)
Translation difference	(49.816)	(49.816)
Charge for the period	(17.055)	(17.055)
Closing balance as of 31 December 2020	(274.736)	(274.736)
Net book value as of 31 December 2019	251.448	251.448
Net book value as of 31 December 2020	303.443	303.443

As of 31 December 2020, the Company has no collaterals or pledges on intangible assets.

The breakdown of amortization expenses related to intangible assets is as follows:

Associated with cost of production	31 December 2021	31 December 2020
	19.288	17.055
	19.288	17.055

NOTE 15 – RIGHT OF USE ASSETS

As of the reporting date the movement of right of use assets is as follows:

	Right to	Vehicle	
	Use Land	Leases	Total
Cost			
Opening balance as of 1 January 2021	318.054	7.702	325.756
Additions to assets of operating lease	32.324	9.930	42.254
Disposals (-)	-	(6.447)	(6.447)
Translation difference	278.113	8.292	286.405
Closing balance as of 31 December 2021	628.491	19.477	647.968
Accumulated Depreciation			
Opening balance as of 1 January 2021	20.485	4.673	25.158
Charge for the period	14.275	3.377	17.652
Disposals (-)	-	(5.702)	(5.702)
Translation difference	24.944	2.472	27.416
Closing balance as of 31 December 2021	59.704	4.820	64.524
Net book value as of 31 December 2021	568.787	14.657	583.444

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 15 – RIGHT OF USE ASSETS (cont'd)

The movement of right of use assets for the reporting period is as follows:

	Right to	Vehicle	
	Use Land	Leases	Total
Cost			
Opening balance as of 1 January 2020	234.532	4.469	239.001
Additions to assets of operating lease	35.583	2.080	37.663
Disposals (-)	(8.637)	-	(8.637)
Translation difference	56.576	1.153	57.729
Closing balance as of 31 December 2020	318.054	7.702	325.756
Accumulated Depreciation			
Opening balance as of 1 January 2020	7.562	1.666	9.228
Charge for the period	10.632	2.494	13.126
Translation difference	2.291	513	2.804
Closing balance as of 31 December 2020	20.485	4.673	25.158
Net book value as of 31 December 2020	297.569	3.029	300.598

As of the reporting date the items right of use assets recognized in profit or loss is as follows:

	31 December	31 December
	2021	2020
Amortization of assets to operating lease (Note 25, 26)	(17.652)	(13.126)
Interest expense from lease transactions (Note 29)	(33.266)	(31.101)

The net book value of the right-of-use assets acquired through the lease is as follows:

	31 December	31 December
	2021	2020
Right to use land	568.787	297.569
Car leases	14.657	3.029
	583.444	300.598

The Company has usage permit agreements regarding the port areas of the General Directorate of National Real Estate. Usage permit periods of the tangibles that will expire in 2048 and 2050 are measured at their present value by reducing the borrowing rate by 12%-16%.

The Company has a usage permit agreement of regarding the forest land of the General Directorate of Forestry. Forest land use permit will expire in 2068. The value of the immovable asset was measured at present value by reducing the borrowing rate in the first calculation with 12%.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 15 - RIGHT OF USE ASSETS (cont'd)

In addition, leasing contracts of the vehicle whose usage period is between 2022-2024 and whose borrowing rate has been reduced by 13% - 25% have been measured in accordance with the above explanations.

According to the above explanations, lease agreements accounted in the right of use assets and borrowings notes (Note 8) in the statement of financial position.

The distribution of amortization expenses related to right of use assets is as follows:

	31 December	31 December
	2021	2020
General administrative expenses	3.377	2.494
Other operating expenses	14.275	10.632
	17.652	13.126

NOTE 16 – GOVERNMENT GRANTS AND INCENTIVES

These grants and incentives can be used by all companies, which meet the related legislative requirements and those grants have no sectoral differences:

- ✓ Incentives under the jurisdiction of the research and development law (100% corporate tax exemption etc.),
- ✓ Cash incentives from Tübitak Teydeb for cost of research and development,
- ✓ Inward processing permission certificates and Social Security Institution incentives,
- ✓ Social Security Institution incentives
- ✓ Insurance premium employer share incentive.

Research and development incentive premiums received or certain to be received amounts to TRY 1.267 thousand (31 December 2020: TRY 1.362) which are considered as a deduction subject in the calculation of corporate tax as of the reporting date.

NOTE 17 – EMPLOYEE BENEFITS

The Company's short term payables for employee benefits are as follows:

	31 December	31 December
	2021	2020
Due to personnel	81.359	52.610
Social security premiums payable	18.263	14.582
	99.622	67.192

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 17 – EMPLOYEE BENEFITS (cont'd)

Long term provision of the employee termination benefits of the Company is as follows:

	31 December	31 December
	2021	2020
Provisions for employee termination benefits	505.562	313.567
Provisions for seniority incentive premium	90.872	50.568
Provision for unpaid vacations	51.363	39.021
	647.797	403.156

According to the Turkish Labor Law, the company is obliged to pay severance pay to every employee who has completed at least one year of service and retired after 25 years of working life, who has been dismissed, called for military service or died.

As of 31 December 2021, the amount payable consists of one month's salary limited to a maximum of TRY 8.284,59 (31 December 2020: TRY 7.117,17) As of 1 January 2022, the employee termination benefit has been updated to a maximum of TRY 10.848,59.

The employee termination benefit legally is not subject to any funding requirement.

The employee termination benefit has been calculated by estimating the present value of the future probable obligation of the Company arising from the retirement of employees. TAS 19 ("Employee Benefits") requires actuarial valuation methods to be developed to estimate the Company's obligation under defined benefit plans. The obligation as of 31 December 2021 has been calculated by an independent actuary and projected unit credit method is used in the calculation.

The actuarial assumptions used in the calculation of the present value of the future probable obligation are as follows:

	31 December 2021	31 December 2020
Discount rate	%19,00	%12,80
Inflation rate	%15,00	%8,50
Salary increase	reel %1,5	reel %1,5
Maximum liability increase	%15,00	%8,50

Discount rates are determined considering the expected duration of the retirement obligations and the currency in which the obligations will be paid. In calculations as of 31 December 2021, a fixed discount rate is used. Long term inflation estimates are made using an approach consistent with discount rate estimates and long term inflation rate fixed over years is used.

The anticipated rate of resignation which do not result in the payment of employee benefits is also considered in the calculation. The anticipated rate of resignation is assumed to be related with the past experience, therefore past experiences of employees are analyzed and considered in the calculation. In the actuarial calculation as of 31 December 2021, the anticipated rate of resignation is considered to be inversely proportional to the past experience. The anticipated rate of resignation is between 2%-0% for the employees with past experience between 0-15 years or over.

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 17 – EMPLOYEE BENEFITS (cont'd)

The movement of the provision for employee termination benefits is as follows:

	1 January – 31 December 2021	1 January – 31 December 2020
Opening balance	313.567	273.104
Service cost	23.023	20.293
Interest cost	48.104	35.701
Actuarial loss / gain	140.234	7.039
Termination benefits paid	(24.105)	(23.253)
Translation difference	4.739	683
Closing balance	505.562	313.567

The principal assumptions used in the calculation of retirement pay liability are discount rate and anticipated turnover rate. All other variables were held constant, the sensitivity analysis of the assumptions which was used for the calculation of provision for employment termination benefits as of 31 December 2021 as follows:

	Interest rate	
Change in Rate	1% increase	1% decrease
Change in employee benefits liability	(38.339)	43.660
	Inflation rate	;
Change in Rate	1% increase	1% decrease
Change in employee benefits liability	44.868	(39.911)

According to the current labor agreement, employees completing their 10th, 15th and 20th service years receive seniority incentive premium payments.

The movement of the provision for seniority incentive premium is as follows:

	1 January –	1 January –
	31 December 2021	31 December 2020
Opening balance	50.568	30.904
Service cost	5.931	3.466
Interest cost	7.983	4.648
Actuarial loss/(gain)	28.361	13.456
Termination benefits paid	(2.059)	(1.924)
Translation difference	88	18
Closing balance	90.872	50.568

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 17 – EMPLOYEE BENEFITS (cont'd)

The movement of the provision for unused vacation is as follows:

	1 January –	1 January –
	31 December 2021	31 December 2020
Opening balance	39.021	30.749
Provision for the period	51.955	42.081
Vacation paid during the period (-)	(2.790)	(1.945)
Provisions released (-)	(36.505)	(32.024)
Translation difference	(318)	160
Closing balance	51.363	39.021

NOTE 18-PROVISIONS

The Company's short term provisions are as follows:

	31 December	31 December
	2021	2020
Provision for lawsuits	68.859	49.763
Penalty provision for employment shortage of disabled person	9.932	9.938
Provision for land occupation	2.993	2.542
	81.784	62.243

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 18 – PROVISIONS (cont'd)

The movement of the short term provisions is as follows:

	1 January 2021	Change for the period	Payments	Provision released	Çevrim farkı	31 December 2021
Provision for lawsuits Penalty provision for employment shortage of disabled personnel	49.763 9.938	26.748 376	(696) -	(17.650) (270)	10.694 (112)	68.859 9.932
Provision for land occupation	2.542	657		(270)	64	2.993
	62.243	27.781	(696)	(18.190)	10.646	81.784
	1 January 2020	Change for the period	Payments	Provision released	Çevrim farkı	31 December 2020
Provision for lawsuits	35.558	16.230	(431)	(3.621)	2.027	49.763
Penalty provision for employment shortage of disabled personnel	9.635	301	-	-	2	9.938
Provision for land occupation	2.138	628		(228)	4	2.542
	47.331	17.159	(431)	(3.849)	2.033	62.243

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 18 - PROVISIONS (cont'd)

As of reporting period, lawsuits filed by and against the Company are as follows:

	31 December	31 December
	2021	2020
Lawsuits filed by the Company	165.908	156.769
Lawsuits filed against the Company	5.171	3.183

The provisions for the lawsuits filed by the Company represents the doubtful trade receivables.

	31 December	31 December
	2021	2020
Lawsuits filed against the Company	49.756	28.707
Provision for lawsuits filed by the Company	68.859	49.763

The Decision of the Constitutional Court for Electricity and Air Gas Consumption Tax

The claims filed every month for refunding of taxes paid and deduction thereof from Electric and Coal Gas Tax collected by the Municipality on the Electric and Coal Gas consumption quantity produced by the Company in the facilities and used for industrial production of the Company were concluded in the court of first instance and the Council of State against the company. Thereafter, the Company used its right on 15 January 2015 to apply the Constitutional Court individually. As a result of the General Assembly Resolution of the Supreme Court the Company, which was issued on 25 October 2018 and published in the Official Gazette on 25 December 2018, was notified and stated that the property rights of the Company were violated, and retrial was decided 22 trials for the applicable claims to eliminate the consequences of the violation of the property rights.

Similarly, it was decided by the Supreme Court that it was combined within the scope of our individual application and that the Company's right to property was violated in 25 cases that were concluded, and that the trials in the relevant lawsuits were taken to eliminate the consequences of the violation of the right to property.

47 lawsuits, which were decided to retrial by the Constitutional Court, were reappeared in the Hatay Tax Court, and it was decided by the Local Court to accept cases in favor of the Company. In addition, based upon the decisions awarded in 9 cases by Constitutional Court, Hatay 1st Tax Court and overturned 12 cases after the Council of State, District Courts of Appeals, accepted 68 cases in favor of the Company. Total number of the cases brought by the Company is 80. 68 out of 80 cases have been awarded in favor of the Company, 12 out of 80 cases are still pending before Constitutional Court.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 19 – COMMITMENTS

The guarantees received by the Company are as follows:

	31 December	31 December
	2021	2020
Letters of guarantees received	2.503.967	1.179.636
	2.503.967	1.179.636

The Collaterals, Pledges and Mortgages (CPM) given by the Company are as follows:

_	31 December 2021	31 December 2020
A. Total CPM given for the Company's own legal entity B. Total CPM given in favour of subsidiaries consolidated on line-by-line basis	64.495	57.538
C. Total CPM given in favour of other 3rd parties for ordinary trading operations	_	_
D. Other CPM given	-	_
i. Total CPM given in favour of parent entity	_	-
ii. Total CPM given in favour of other Group companies out of the scope of clause B and C	-	-
iii. Total CPM given in favour of other 3rd parties out of		
the scope of clause C	<u>-</u>	-
	64.495	57.538

As of reporting period, the ratio of the other CPM given by the Company consist of letters of guarantee to shareholders equity is 0% (31 December 2020: 0%).

The breakdown of the Company's collaterals given regarding service purchases according to their TRY equivalents of foreign currency is as follows:

	31 December 2021	31 December 2020
TRY	34.321	39.522
EURO	30.174	18.016
	64.495	57.538

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 20 - OTHER ASSETS AND LIABILITIES

As of the balance sheet date, the details of the Company's other assets and liabilities are as follows:

Other current assets

	31 December 2021	31 December 2020
Other VAT receivable	81.634	69.898
Deferred VAT	13.943	-
Prepaid taxes and funds	5.841	1.483
Other current assets	41	1.961
	101.459	73.342
Other current liabilities		
	31 December 2021	31 December 2020
VAT payable	-	120.761
Other current liabilities	3.114	1.549
	3.114	122.310

NOTE 21 – DEFERRED REVENUE

As of the balance sheet date, the details of the Company's short term deferred revenue are as follows:

	31 December	31 December
	2021	2020
Advances received	501.777	107.277
Deferred income	14.386	3.523
	516.163	110.800

NOTE 22 – EQUITY

As of the balance sheet date, the capital structure is as follows:

	31 December		31 December
<u>(%)</u>	2021	<u>(%)</u>	2020
94,87	2.751.326	94,87	2.751.326
5,13	148.674	5,13	148.674
	2.900.000		2.900.000
	164		164
	2.900.164		2.900.164
	94,87	(%) 2021 94,87 2.751.326 5,13 148.674 2.900.000 164	(%) 2021 (%) 94,87 2.751.326 94,87 5,13 148.674 5,13 2.900.000 164

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 22 - EQUITY (cont'd)

	31 December	31 December
Other equity items	2021	2020
Cash Flow Hedging Reserves	10.809	-
Foreign Currency Translation Reserves	23.667.446	9.074.302
Actuarial (Loss)/ Gain Fund	(166.482)	(54.295)
Restricted Reserves Assorted from Profit	2.193.560	1.401.860
_Legal Reserves	2.193.560	1.401.860
Retained Earnings	4.083.318	6.235.437
	29.788.651	16.657.304

According to the Turkish Commercial Code ("TCC"), legal reserves split up as the first legal reserves and the second legal reserves. According to the Turkish Commercial Code 5% of the profit shall be allocated as the first legal reserves, up to 20% of the paid/issued capital. After deducting dividends amounting to 5% of the paid/issued capital from the part decided to be allocated; 10% percent of the remaining balance shall be appropriated to second legal reserves. According to the "TCC", as long as the legal reserves do not exceed 50% of the paid-in capital, they can only be used to offset losses and cannot be used in any other way.

The sources which might be used in dividend distribution, including to accumulated profits to TRY 44.787 thousand and the net profit for the period to TRY 13.135.660 thousand, in statutory books of the Company are equal to TRY 13.180.447 thousand as of reporting date.

The amendment in TAS-19 "Employee Benefits" does not permit the actuarial gain /loss considered in the calculation of provision for employee termination benefits to be accounted for under the statement of income. The gains and losses arising from the changes in the actuarial assumption have been accounted for by "Actuarial (Loss)/Gain Funds" under the equity. The funds for actuarial gains/ (losses) in the employee termination benefits is not in a position to be reclassified under profit and loss.

As it stated in Note 2.1, foreign currency translation reserve arises from expressing the assets and liabilities of the Company's foreign operations in reporting currency TRY by using exchange rates prevailing on the balance sheet date. Exchange differences arising, if any, are recognized under translation reserve in equity.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 23 – SALES AND COST OF SALES

The Company derives its revenue from the transfer of goods at a point in time in the following major product lines. The amount of performance obligations in the ongoing contracts of the Company will be eligible for recognition in the future is TRY 501.777 thousand. (Note 21) The Company planning to recognize related revenue amount as a revenue in a year.

The breakdown of sales revenue for the reporting period is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Sales Revenue		
Domestic sales	28.782.739	13.721.356
Export sales	6.944.398	2.652.468
Other revenues (*)	730.301	524.012
Interest income from sales with maturities	46.781	27.238
Sales returns (-)	(4.703)	(981)
	36.499.516	16.924.093
Cost of sales (-)	(22.780.744)	(13.716.418)
Gross profit	13.718.772	3.207.675

(*)The total amount of by product exports in other revenues is TRY 393.723 thousand (31 December 2020: TRY 237.864 thousand).

The breakdown of cost of goods sales for the reporting period is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Raw material usage	(19.178.174)	(10.605.125)
Personnel costs	(789.907)	(686.316)
Energy costs	(739.283)	(578.438)
Depreciation and amortization expenses	(868.013)	(737.201)
Factory overheads	(318.301)	(422.482)
Other cost of goods sold	(405.421)	(461.846)
Non-operating costs (*)	(40.259)	(31.260)
Freight costs for sales delivered to customers	(346.604)	(107.878)
Inventory write-downs within the period (Note 11)	-	(15.805)
Reversal of inventory write-downs (Note 11)	4.011	3.813
Other	(98.793)	(73.880)
	(22.780.744)	(13.716.418)

^(*) TRY (40.259 thousand) of unallocated expenses due to the planned/unplanned halt in the production plant of the Company, has been accounted directly under cost of goods sold (31 December 2020: TRY (31.260) thousand).

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(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 24 – RESEARCH AND DEVELOPMENT EXPENSES, MARKETING EXPENSES, GENERAL ADMINISTRATIVE EXPENSES

The breakdown of operational expenses according to their nature for the reporting periods is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Marketing, sales and distribution expenses (-)	(159.188)	(114.911)
General administrative expenses (-)	(213.856)	(187.814)
Research and development expenses (-)	(452)	(241)
	(373.496)	(302.966)

NOTE 25 - OPERATING EXPENSES ACCORDING TO THEIR NATURE

The breakdown of marketing expenses according to their nature for the reporting period is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Personnel expenses (-)	(33.789)	(28.306)
Depreciation and amortization(-)	(36.619)	(21.819)
Tax, duty and charges (-)	(963)	(958)
Service expenses (-)	(87.817)	(63.828)
	(159.188)	(114.911)

The breakdown of general administrative expenses for the reporting period is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Personnel expenses (-)	(67.831)	(53.318)
Depreciation and amortization expenses (-)	(5.378)	(4.344)
Amortization expense of right of use (-)	(3.377)	(2.494)
Provision for doubtful receivables (-) net	83	(3.045)
Tax, duty and charges (-)	(11.619)	(18.944)
Service expenses (-)	(125.734)	(105.669)
	(213.856)	(187.814)

Fees for services received from an independent audit firm

Company's; Based on the Board Decision of the Public Oversight, Accounting and Auditing Standards Authority published in the "POA" Official Gazette, the fees related to the services received from the independent auditor/independent audit firm as of the reporting period are as follows:

1 January -	1 January -
31 December 2021	31 December 2020
(359)	(283)
	(20)
(359)	(303)
	31 December 2021 (359)

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 26 – OTHER OPERATING INCOME/EXPENSES

The breakdown of other operating income for the reporting period is as follows:

1 January-	1 January-
31 December 2021	31 December 2020
	488
17.920	3.621
9.308	6.490
14.586	13.232
497	1.475
8.101	4.066
9.881	20.080
1.568	1.329
263	945
-	146.556
27.875	15.524
89.999	213.806
	31 December 2021 17.920 9.308 14.586 497 8.101 9.881 1.568 263 27.875

The breakdown of other operating expenses for the reporting period is as follows:

	1 January -	1 January -
Other operating expenses (-)	31 December 2021	31 December 2020
Provision expenses	(27.124)	(16.531)
Donation expenses	(4.431)	(5.212)
Discount expenses	(1.643)	-
Amortization expenses of right of use	(14.275)	(10.632)
Foreign exchange expenses from trade receivables and		
payables	(340.123)	(6.144)
Penalty expenses	(5.719)	(650)
Service expenses	(2.568)	(2.231)
Lawsuit compensation expenses	(4.777)	(1.983)
Other expenses and losses	(25.153)	(11.439)
_	(425.813)	(54.822)

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 27 – INVESTING ACTIVITIES INCOME/EXPENSES

The breakdown of investing activities income for the reporting period is as follows:

	1 January -	1 January -
Income from Investing Activities	31 December 2021	31 December 2020
Gain on sales of tangible assets	108	149.573
	108	149.573

The breakdown of investing activities expenses for the reporting period is as follows:

1 January-	1 January-
31 December 2021	31 December 2020
(38)	(98)
(2.774)	(6.544)
(2.812)	(6.642)
	(38) (2.774)

NOTE 28 – FINANCE INCOME

The breakdown of financial income for the reporting period is as follows:

	1 January -	1 January -
Finance income	31 December 2021	31 December 2020
Interest income on bank deposits	143.103	2.520
Foreign exchange gains	-	339.585
Interest income on related party	681.532	245.053
Fair value differences of derivative financial instruments (net)	23.476	-
Other financial income	21.214	-
	869.325	587.158

NOTE 29 – FINANCE EXPENSES

The breakdown of financial expenses for the reporting period is as follows:

Finance expenses (-)	1 January- 31 December 2021	1 January- 31 December 2020
<u> </u>		
Interest expenses on borrowings	(62.221)	(43.193)
Foreign exchange loss (net)	(3.558.495)	-
Interest cost of employee benefits	(56.087)	(40.349)
Interest expenses on leases	(33.266)	(31.101)
Other financial expenses	(3.236)	(20.109)
	(3.713.305)	(134.752)

During the period, the interest expenses of TRY 11.861 thousand have been capitalized as part of the Company's property, plant and equipment (31 December 2020: TRY 13.549).

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 30 – TAX ASSETS AND LIABILITIES

The breakdown of profit for the period tax liability for the reporting period is as follows:

	31 December	31 December
	2021	2020
Corporate tax payable:		
Current corporate tax expense	4.615.442	1.243.844
Prepaid taxes and funds (-)	(2.747.318)	(887.010)
	1.868.124	356.834
	1 January -	1 January -
	31 December 2021	31 December 2020
<u>Taxation:</u>		_
Current corporate tax expense	2.922.007	1.243.844
Deferred tax expense	766.675	(478)
	3.688.682	1.243.366

Corporate tax

The Company is subject to corporation tax applicable in Turkey. The necessary provisions are allocated in the financial statements for the estimated liabilities based on the Company's results for the year.

Corporate tax is applied on taxable corporate income, which is calculated from the statutory accounting profit by adding non-deductible expenses, and by deducting dividends received from resident companies, other exempt income and other deductions (retained losses if any, used investment allowance if required).

The effective corporate tax rate is 25% as of 2021 (2020: 22%).

The total amount of the corporate tax paid by the Company in 2021 is TRY 3.104.152 thousand (31 December 2020: TRY 1.037.742 thousand).

In Turkey, advance tax returns are filed on a quarterly basis. The temporary tax of 2021 has been calculated over the corporate earnings using the rate 25%, during the temporary taxation period. (31 December 2020: 22%).

Pursuant to the Provisional Article of the Law on Corporate Income Tax added with the Article 11 of the Law No. 7316, published in the Official Gazette dated April 22, 2021 and numbered 31462, the corporate tax rate for corporate earnings to be obtained during the tax years 2021 has been increased from 25% and the corporate tax rate for corporate earnings to be obtained during the tax years 2022 has been increased from 23%. With the amendment added to Article 32 of the Corporate Income Tax Law, these rates will be applied with a discount of 1 point to the earnings from production activities and exports.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 30 – TAX ASSETS AND LIABILITIES (cont'd)

Corporate tax (cont'd)

Except for the changes in the corporate tax rate, the 75% exemption applied to the earnings generated from the sale of tangibles is reduced to 50% and the deferred tax rate to be applied based on the temporary differences arising on the revaluation of the related assets, 10% instead of 5%.

Losses can be carried forward to offset the future taxable income for up to maximum 5 years. However, losses cannot be carried back to offset the profits of the previous periods, retrospectively.

In Turkey, a definite and distinct reconciliation procedure for tax assessment does not exist. Companies file their tax returns between 1 April - 25 April following the closing period of the related year's accounts. Tax returns and related accounting records may be examined and revised by tax authority within five years.

Income withholding tax

In addition to corporate taxes, companies should also calculate income withholding taxes on dividends distributed, except for the dividends distributed to fully fledged taxpayer companies receiving and declaring these dividends and to Turkish branches of foreign companies. The rate of %10 income withholding tax is applied since 22 December 2021 by the decision of the Presidentail Decree, No 4936. Undistributed dividends incorporated in share capital are not subject to the income withholding taxes.

Deferred tax

The Company recognizes deferred tax assets and liabilities based upon the temporary differences arising between its statutory financial statements and its financial statements prepared in accordance with the TFRS. These differences usually result in the recognition of some income and expenses statutory in different reporting periods in the financial statements prepared according to TFRS.

In accordance with the article 32 added to the Corporate Tax Law for subsidiaries in Turkey, the tax rate used in the calculation of deferred tax assets and liabilities (other than land) is 22% for corporate earnings for the 2021 and 2022 taxation period according as with a discount of 1 point to the earnings from production activities and exports and 20% for 2023 and the following years. The deferred tax on the temporary timing differences arising from land is calculated with the 10% tax rate (31 December 2020: %10).

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 30 – TAX ASSETS AND LIABILITIES (cont'd)

Deferred tax (cont'd)

The breakdown of deferred tax assets and liabilities for the reporting period is as follows:

	31 December	31 December
<u>-</u>	2021	2020
<u>Deferred tax assets:</u>		
Provisions for employee benefits	130.994	80.631
Leasing payables	54.327	46.274
Provision for lawsuits	15.198	8.690
Adjustment of receivable rediscount	4.949	3.968
Other	33.044	17.615
	238.512	157.178
Deferred tax liabilities:		
Tangible and intangible fixed assets	(4.504.212)	(2.238.059)
Right of use assets	(117.305)	(60.119)
Amortized cost adjustment on loans	(12.328)	(7.516)
Fair values of the derivative financial instruments	(11.394)	-
Inventories	(699.803)	(9.587)
- -	(5.345.042)	(2.315.281)
Deferred tax assets/(liabilities) net:	(5.106.530)	(2.158.103)

The temporary differences disclosed above besides the deferred tax asset and liabilities, have been prepared on the basis of the gross values and show the net deferred tax position.

The breakdown of deferred tax asset / (liability) is as follows:

	1 January -	1 January -
	31 December 2021	31 December 2020
Opening balance	(2.158.103)	(1.748.423)
Deferred tax (expense)/income	(766.675)	478
The amount in comprehensive income/(expense)	24.998	1.408
Translation difference	(2.206.750)	(411.566)
Closing balance	(5.106.530)	(2.158.103)

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NOTE 30 - TAX ASSETS AND LIABILITIES (cont'd)

Deferred tax (cont'd)

Reconciliation of tax provision is as follows:

	1 January-	1 January-
	31 December	31 December
Reconciliation of tax provision	2021	2020
Profit before tax	10.157.036	3.666.715
Statutory tax rate	25%	22%
Calculated tax acc. to effective tax rate	(2.539.259)	(806.677)
Reconciliation between the tax provision and calculated tax:		
- Non-deductible expenses	(2.455)	(392)
- Adjustment effect of corporate tax rate and rates subject to deferred tax	66.724	168.365
- Non-taxable income	3.082	476
- Effect of currency translation (*)	(1.216.774)	(605.138)
Tax expense in reported in the statement of income	(3.688.682)	(1.243.366)

^(*) The difference between the Company's functional currency and the currency in basis of tax base cause to translation difference.

As of reporting period, the details of the tax gains/(losses) of the other comprehensive income/(expense) are as follows:

	1 Janu	ary -31 December 2021	
	Amount	Tax income/	Amount
Other comprehensive income/(loss)	before tax	(expense)	after tax
Change in actuarial (loss)/gain	(140.234)	28.047	(112.187)
Change in cash flow hedging reserves	13.858	(3.049)	10.809
Change in foreign currency translation reserves	18.871.376	-	18.871.376
	18.745.000	24.998	18.769.998
	1.7		
	1.7		
		ary -31 December 2020	
	Amount	Tax income/	Amount
Other comprehensive income/(loss)		· · · · · · · · · · · · · · · · · · ·	
Other comprehensive income/(loss) Change in actuarial (loss)/gain	Amount	Tax income/	Amount
	Amount before tax	Tax income/ (expense)	Amount after tax
Change in actuarial (loss)/gain	Amount before tax (7.039)	Tax income/ (expense)	Amount after tax (5.631)

NOTE 31 – EARNINGS PER SHARE

	1 January - 31 December 2021	1 January - 31 December 2020
Number of shares outstanding	290.000.000.000	290.000.000.000
Net profit attributable to equity holders - TRY thousand	6.468.354	2.423.349
Profit per share with 1 TRY nominal value TRY %	2,2305 / %223,05	0,8356 / %83,56

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 32 – RELATED PARTY DISCLOSURES

The immediate parent and ultimate controlling parent of the Company are Ereğli Demir ve Çelik Fabrikaları T.A.Ş. and Ordu Yardımlaşma Kurumu respectively (Note 1).

Trade receivables and payables from related parties operated as current account. Debt collection and debt payment days are between 0 and 30.

The details of receivables of the Company from related parties are disclosed below:

	31 December	31 December
<u>Due from related parties (short term)</u>	2021	2020
Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (1)	1.573.663	967.223
OYAK Çimento Fabrikaları A.Ş. (3)	33.642	21.844
OYAK İnşaat A.Ş. (3)	5	-
OYAK Sentetik Karbon Ürünleri San. Ve Tic. A.Ş. (3)	3	-
OYAK Beton Sanayi ve Tic. A.Ş. (3)	-	103
İsdemir Linde Gaz Ortaklığı A.Ş. (4)	12.569	3.807
	1.619.882	992.977

The trade receivables from related parties mainly arise from sales of iron, steel and by-products.

The details of other receivables between the Company and other related parties are disclosed below:

Other receivables from related parties (short term)	31 December 2021	31 December 2020
Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (1)	21.225	6.873.430
İsdemir Linde Gaz Ortaklığı A.Ş. (4)	-	6.489
	21.225	6.879.919

Erdemir's personnel, data system infrastructure and marketing management system are used by The Company for selling flat products to third parties. Flat products which are produced in İsdemir, directly selling over Erdemir and Erdemir takes these inventories as a "Trade goods". Erdemir sells such products through their buying price and date, without adding any profit. Accordingly, in the financial statements, balances of trade receivables and other receivables are arisen from centralized selling.

The details of prepaid expenses between the Company and other related parties are disclosed below:

	31 December	31 December
Prepaid expenses (long term)	2021	2020
OYAK Savunma ve Güvenlik Sistemleri A.Ş. (3)	44.650	12.868
	44.650	12.868

Prepaid expenses to related parties arise from advances given for tangible assets and port services.

- (1) Immediate parent company
- (2) Subsidiaries of the immediate parent company
- (3) Subsidiaries of the ultimate company
- (4) Joint Managing Company

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 32 – RELATED PARTY DISCLOSURES (cont'd)

The details of payables of the Company to the related parties are disclosed below:

	31 December	31 December
Due to related parties (short term)	2021	2020
Erdemir Madencilik San. ve Tic. A.Ş. (2)	241.994	284.920
OYAK Pazarlama Hizmet ve Turizm A.Ş. (3)	10.036	10.298
Erdemir Asia Pacific PTE LTD (2)	96.114	47.480
Omsan Lojistik A.Ş. (3)	11.401	7.168
OYAK Savunma ve Güvenlik Sistemleri A.Ş. (3)	5.260	3.113
OYAK Denizcilik ve Liman İşletmeleri A.Ş. (3)	14.505	11.406
Erdemir Çelik Servis Merkezi San. ve Tic. A.Ş. (2)	1.777	865
Erdemir Müh. Yön. ve Dan. Hiz. A.Ş. (2)	5.341	2.908
Kümaş Manyezit Sanayi A.Ş. (2)	25.619	-
Omsan Denizcilik A.Ş. (3)	-	9.925
Other	23.428	6.877
	435.475	384.960

The trade payables from related parties are generally due to the purchase of raw material, material and service transactions.

The details of transactions between the Company and related parties are disclosed below:

	1 January – 31 December 2021	1 January – 31 December 2020
Major sales to related parties	31 December 2021	J1 December 2020
Ereğli Demir ve Çelik Fabrikaları T.A.Ş. (1)	24.089.683	11.004.575
Erdemir Çelik Servis Merkezi San. ve Tic. A.Ş. (2)	2.734	2.257
Ordu Yardımlaşma Kurumu	-	163.436
Omsan Lojistik A.Ş. (3)	234	509
OYAK Çimento Fabrikaları A.Ş. (3)	45.648	40.162
OYAK Elektrik Enerjisi Toptan Satış A.Ş. (3)	25.834	6.436
OYAK Pazarlama Hizmet ve Turizm A.Ş. (3)	1.881	1.902
OYAK Denizcilik ve Liman İşletmeleri A.Ş. (3)	786	33.083
OYAK Savunma ve Güvenlik Sistemleri A.Ş. (3)	1.231	941
İsdemir Linde Gaz Ortaklığı A.Ş. (4)	86.320	61.382
Other	354	1.228
	24.254.705	11.315.911

The major sales to related parties are generally due to the sales transactions of iron, steel, energy, service and by products.

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⁽¹⁾ Immediate parent company

⁽²⁾ Subsidiaries of the immediate parent company

⁽³⁾ Subsidiaries of the ultimate company

⁽⁴⁾ Joint Managing Company

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NOTE 32 – RELATED PARTY DISCLOSURES (cont'd)

1 January –	1 January –
31 December 2021	31 December 2020
14.029	6.262
29.022	1.737
2.961.659	1.386.696
2.909.429	655.270
198.113	165.724
84.854	76.945
36.045	98.095
65.814	37.419
77.440	68.121
13.510	13.476
49.161	35.639
146.224	109.639
102.093	77.462
47.154	-
10.362	20.119
6.744.909	2.752.604
	31 December 2021 14.029 29.022 2.961.659 2.909.429 198.113 84.854 36.045 65.814 77.440 13.510 49.161 146.224 102.093 47.154 10.362

The major purchases from related parties are generally due to the purchased raw material, material, energy and service transactions.

The Company earned TRY 718.025 thousand (31 December 2020: TRY 268.460 thousand) of revenue from related party transactions of the twelve- month period of 2021, amounting to TRY 681.532 thousand of interest income and TRY 36.493 thousand of interest accrued on term.

The terms and policies applied to the transactions with related parties:

The period end balances are secured and their collections will be done in cash. Other receivables from related parties balances are non-secured, interest-bearing and their collections will be done in cash. As of 31 December 2021, the Company provides no provision for the receivables from related parties (31 December 2020: None).

Salary, premium and similar benefits provided to executive managers:

The company's key management team consists of the Board of Directors, General Manager and Assistant General Managers.

For the year ended 31 December 2021, the total compensation consisting of short term benefits such as salaries, bonuses and other benefits of the key management of the Company is TRY 7.261 thousand (31 December 2020: TRY 5.032 thousand).

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⁽¹⁾ Immediate parent company

⁽²⁾ Subsidiaries of the immediate parent company

⁽³⁾ Subsidiaries of the ultimate company

⁽⁴⁾ Joint Managing Company

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS

Additional information about financial instruments

(a) Capital risk management

The Company manages its capital through the optimization of the debt and the equity balance that minimizes the financial risk.

Through the forecasts regularly prepared by the Company, the future capital amount, debt to equity ratio and similar ratios are forecasted and required precautions are taken to strengthen the capital.

The capital structure of the Company consists of debt which includes the financial liabilities disclosed in Note 8, cash and cash equivalents and equity attributable to equity holders of the parent company, comprising issued capital, reserves and retained earnings as disclosed in Note 22.

The Company's Board of Directors analyzes the capital structure in regular meetings. During these analyses, the Board of Directors also evaluates the risks associated with each class of capital together with the cost of capital. The Company, by considering the decisions of the Board of Directors, aims to balance its overall capital structure through the payment of dividends, new share issues and share buybacks as well as the issue of new debt or the redemption of existing debt.

As of reporting period the net debt/equity ratio is as follows:

		31 December	31 December
	Not	2021	2020
Total financial liabilities	8	5.052.821	1.195.680
Less: Other receivables from related parties	32	21.225	6.879.919
Less: Cash and cash equivalents	4	8.824.568	38.603
Net debt		(3.792.972)	(5.722.842)
Total adjusted equity (*)		39.312.842	22.035.112
Total resources		35.519.870	16.312.270
Net debt / Total adjusted equity ratio		-10%	-26%
Distribution net debt / Total adjusted equity		-11/111	-35/135

^(*) Total adjusted equity is calculated by subtracting cash flow hedging reserves and actuarial (loss)/gain fund.

(b) Significant accounting policies

The Company's accounting policies related to the financial instruments are disclosed in Note 2 "Summary of Significant Accounting Policies, 2.7.8 Financial Instruments".

(c) Market risk

The Company is exposed primarily to the financial risks of changes in foreign exchange rates and interest rates. The Company utilizes the following financial instruments to manage the risks associated with the foreign exchange rates and interest rates. Also, the Company follows price changes and market conditions regularly and takes action in pricing instantaneously.

The Company prefers floating interest rates for long term borrowings. To hedge against the interest risk the Company uses interest swap agreements for some of its borrowings.

In the current period, there is no significant change in the Company's exposure to the market risks or the manner which it manages and measures risk when compared to the previous year.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(d) Credit risk management

Trade receivables include a large number of customers from various industries and regions. There is no risk concentration on a specific customer or a Company of customers. The majority trade receivables are assured by bank letters of guarantee and/or credit limits. The credit reviews are performed continuously over the accounts receivable balance of the customers. The Company does not have a significant credit risk arising from any customer.

Credit risk of financial instruments	Receivables			Bank	Derivative	
	Trade Receivables Other Receivables		Deposits	financial instruments		
31 December 2021	Related Party	Other Party	Related Party	Other Party	_	_
Maximum credit risk exposure as of balance sheet date (*) (A+B+C+D+E) _Secured part of the maximum credit risk exposure via collateral etc.	1.619.882 1.573.663	1.146.263 1.004.593	21.225 21.225	45.393	8.824.568	54.786
A. Net book value of the financial assets that are neither overdue nor impaired	1.619.882	1.146.263	21.225	45.393	8.824.568	54.786
B. Carrying amount of financial assets that are renegotiated, otherwise classified as overdue or impaired	-	-	-	-	-	-
C. Net book value of financial assets that are overdue but not impaired _secured part via collateral etc.	-	-		-	-	-
D. Net book value of impaired financial assets _Overdue (gross carrying amount)	-	- 5.871	-	-	-	-
_Impairment (-)	-	(5.871)	-	-	-	- -
_Secured part via collateral etcNot overdue (gross carrying amount)	-	-	-	-	-	-
_Impairment (-)	-	-	-	-	-	-
_Secured part via collateral etc. E. Off-balance sheet financial assets exposed to credit risk	-	-	-	-	-	-

^(*) The factors that increase credibility such as guarantees received are not taken into account in determination of amount.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(d) Credit risk management (cont'd)

Credir risk of financial instruments	Receivables			Bank	Derivative	
	Trade Receivables Other Receivables		Deposits	financial instruments		
31 December 2020	Related Party	Other Party	Related Party	Other Party		
Maximum credit risk exposure as of balance sheet date (*) (A+B+C+D+E)	992.977	288.227	6.879.919	45.152	38.603	-
_Secured part of the maximum credit risk exposure via collateral etc.	967.223	252.736	6.879.919	-	-	-
A. Net book value of the financial assets that are neither overdue nor impaired	992.977	288.227	6.879.919	45.152	38.603	-
B. Carrying amount of financial assets that are renegotiated, otherwise classified						
as overdue or impaired	-	-	-	-	-	-
C. Net book value of financial assets that are overdue but not impaired	-	-	-	-	-	-
_secured part via collateral etc.	-	-	-	-	-	-
D. Net book value of impaired financial assets	-	-	-	-	-	-
_Overdue (gross carrying amount)	-	3.509	-	-	-	-
_Impairment (-)	-	(3.509)	-	-	-	-
_Secured part via collateral etc.	-	-	-	-	-	-
_Not overdue (gross carrying amount)	-	-	-	-	-	-
_Impairment (-)	-	-	-	-	-	-
_Secured part via collateral etc.	-	-	-	-	-	-
E. Off-balance sheet financial assets exposed to credit risk	-	-	-	-	-	-

^(*) The factors that increase credibility such as guarantees received are not taken into account in determination of amount.

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NOTE 33 –NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(d) Credit risk management (cont'd)

Explanation on the credit risk the company is exposed to:

In order to minimize credit risk, the Company has adopted the policy of obtaining collateral when it deems necessary to work with high-credibility parties and to reduce the risk of financial losses in default. The company monitors the credibility of the parties to which it is traded and takes into account the credit rating of the relevant instruments in its financial investments while making the investment choice. Credit ratings are obtained from independent rating agencies, if available. In case the credit ratings are not available or not, the Company makes its own evaluations about the credibility of its important customers by using the information obtained from the market and commercial records. The company updates these evaluations regularly and manages the credit risk by also considering the total transaction costs with the related parties. When accepting a new customer, the credibility of the customer is evaluated by the relevant departments and appropriate credit limits are defined by taking guarantee when necessary.

Credit risk is the Company's risk of financial loss as a result of the other party's failure to fulfill its contractual obligations. In order to minimize credit risk, the Company has made credit ratings considering the default risks of counterparties and categorized the relevant parties.

The current credit risk rating methodology of the Company includes the following categories:

Category	Explanation	Expected credit loss calculation method
Secured receivables	It consists of collateral-related receivables.	Expected credit loss is not created.
Collectable and overdue receivables	The default risk of the other party is low and it is covered.	Expected credit loss is not created.
Doubtful and overdue receivables	There is evidence to show that the related asset has been impaired by credit.	100% provision is reserved over the unsecured part of the receivable.
Deleted from records	There is evidence that the borrower is in serious financial trouble and the Company does not have an expectation to collect the relevant amounts.	It is completely removed from the records.

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NOTE 33 –NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(e) Foreign currency risk management

As of 31 December 2021, stated in Note 2.7.8 the foreign currency position of the Company in terms of original currency is calculated as it as follows:

		31 Decem	ber 2021	
	TRY	TRY	EURO	Jap. Yen
	(Total in	(Original	(Original	(Original
	currency)	currency)	currency)	currency)
1. Trade Receivables	371.766	36.314	22.235	-
2a. Monetary financial assets	6.007.940	4.756.126	82.975	21
2b. Non- monetary financial assets	-	-	-	-
3. Other	53.405	39.875	897	-
4. Current assets (1+2+3)	6.433.111	4.832.315	106.107	21
5. Trade receivables	-	-	-	-
6a. Monetary financial assets	6.262	6.262	-	-
6b. Non- monetary financial assets	-	-	-	-
7. Other	573.035	501.880	4.716	-
8. Non-current assets (5+6+7)	579.297	508.142	4.716	-
9. Total assets (4+8)	7.012.408	5.340.457	110.823	21
10. Trade payables	1.046.855	822.708	14.650	23.514
11. Financial liabilities	329.081	56.267	18.051	-
12a. Other monetary financial liabilities	2.392.331	2.386.297	399	-
12b. Other non-monetary financial liabilities	-	-	-	-
13. Current liabilities (10+11+12)	3.768.267	3.265.272	33.100	23.514
14. Trade payables	-	-	-	-
15. Financial liabilities	997.768	233.984	50.535	-
16a. Other monetary financial liabilities	647.797	647.797	-	-
16b. Other non-monetary financial liabilities	-	-	-	-
17. Non-current liabilities (14+15+16)	1.645.565	881.781	50.535	-
18. Total liabilities (13+17)	5.413.832	4.147.053	83.635	23.514
19. Net asset/liability position of off-balance sheet derivative				
financial instruments (19a-19b)	(739.780)	-	(48.947)	-
19a. Off-balance sheet foreign currency derivative financial assets 19b. Off-balance sheet foreign currency derivative financial	-	-	-	-
liabilities	739.780	-	48.947	-
20. Net foreign currency asset/liability position (9-18+19)	858.796	1.193.404	(21.759)	(23.493)
21. Net foreign currency asset / liability position				
of monetary items (1+2a+5+6a-10-11-12a-14-15-16a)	972.136	651.649	21.575	(23.493)
22. Fair value of derivative financial instruments used in foreign				
currency hedge	36.897	-	2.441	-
23. Hedged foreign currency assets	739.780	-	48.947	-
24. Hedged foreign currency liabilities	-	-	-	-
25. Exports	7.338.121			
26. Imports	18.852.985			

NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 33 –NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(e) Foreign currency risk management (cont'd)

As of 31 December 2020, the foreign currency position of the Company in terms of original currency is as follows:

		31 Decem	ber 2020	
	TRY	TRY	EURO	Jap. Yen
	(Total in	(Original	(Original	(Original
	currency)	currency)	currency)	currency)
1. Trade Receivables	323.301	323.115	21	-
2a. Monetary financial assets	7.002.001	1.443.354	617.086	21
2b. Non- monetary financial assets	-	-	-	-
3. Other	25.286	11.591	1.520	-
4. Current assets (1+2+3)	7.350.588	1.778.060	618.627	21
5. Trade receivables	-	-	-	-
6a. Monetary financial assets	10.392	10.392	-	-
6b. Non- monetary financial assets	-	-	-	-
7. Other	338.387	259.509	8.757	-
8. Non-current assets (5+6+7)	348.779	269.901	8.757	-
9. Total assets (4+8)	7.699.367	2.047.961	627.384	21
10. Trade payables	693.799	536.630	17.448	-
11. Financial liabilities	208.878	78.879	14.432	-
12a. Other monetary financial liabilities	690.874	687.883	332	-
12b. Other non-monetary financial liabilities	-	-	-	-
13. Current liabilities (10+11+12)	1.593.551	1.303.392	32.212	-
14. Trade payables	-	-	-	-
15. Financial liabilities	735.572	201.030	59.341	-
16a. Other monetary financial liabilities	403.156	403.156	-	-
16b. Other non-monetary financial liabilities	-	_	-	-
17. Non-current liabilities (14+15+16)	1.138.728	604.186	59.341	_
18. Total liabilities (13+17)	2.732.279	1.907.578	91.553	_
19. Net asset/liability position of off-balance sheet derivative				
financial instruments (19a-19b)	_	_	-	_
19a. Off-balance sheet foreign currency derivative financial				
assets	_	_	_	_
19b. Off-balance sheet foreign currency derivative financial				
liabilities	-	-	-	-
20. Net foreign currency asset/liability position (9-18+19)	4.967.088	140.383	535.831	21
21. Net foreign currency asset / liability position				
of monetary items (1+2a+5+6a-10-11-12a-14-15-16a)	4.603.415	(130.717)	525.554	21
22. Fair value of derivative financial instruments used in foreign				
currency hedge	-	-	-	-
23. Hedged foreign currency assets	-	-	-	-
24. Hedged foreign currency liabilities	-	-	-	_
25. Exports	2.890.332			
26. Imports	8.486.815			

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(e) Foreign currency risk management (cont'd)

The following table shows the Company's sensitivity to a 10% (+/-) change in the TRY, EURO and Japanese Yen. 10% is the sensitivity rate used when reporting foreign currency risk internally to key management personnel and represents management's assessment of the possible change in foreign exchange rates.

As of 31 December 2021 asset balances are translated by using the following exchange rates: TRY 13,3290 = US \$ 1, TRY 15,0867 = EUR 1, TRY 0,1155 = JPY 1 and liabilities balances are translated by using the following exchange rates: TRY 13,3530 = US \$ 1, TRY 15,1139 = EUR 1, TRY 0,1163 = JPY 1 (31 December 2020: TRY 7,3405 = US\$ 1, TRY 9,0079 = EUR 1)

	Profit/(loss) after capitaliza	Profit/(loss) after capitalization on tangible		
	assets and before tax and non-controlling inter-			
	Appreciation of	Depreciation of		
31 December 2021	foreign currency	foreign currency		
1- TRY net asset/liability	119.340	(119.340)		
2- Hedged portion from TRY risk (-)	-	-		
3- Effect of capitalization (-)	<u> </u>			
4- TRY net effect (1+2+3)	119.340	(119.340)		
5- Euro net asset/liability	40.790	(40.790)		
6- Hedged portion from Euro risk (-)	(73.978)	73.978		
7- Effect of capitalization (-)	<u> </u>			
8- Euro net effect (5+6+7)	(33.188)	33.188		
9- Jap. Yen net asset/liability	(272)	272		
10- Hedged portion from Jap. Yen risk (-)	-	-		
11- Effect of capitalization (-)	_			
12- Jap. Yen net effect (9+10+11)	(272)	272		
TOTAL (4+8+12)	85.880	(85.880)		

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(e) Foreign currency risk management (cont'd)

	Profit/(loss) after capitalization on tangible assets and before tax and non-controlling interest				
	Appreciation of	Depreciation of			
31 December 2020	foreign currency	foreign currency			
1- TRY net asset/liability	14.038	(14.038)			
2- Hedged portion from TRY risk (-)	-	-			
3- Effect of capitalization (-)					
4- TRY net effect (1+2+3)	14.038	(14.038)			
5- Euro net asset/liability	482.671	(482.671)			
6- Hedged portion from Euro risk (-)	-	-			
7- Effect of capitalization (-)	<u> </u>				
8- Euro net effect (5+6+7)	482.671	(482.671)			
9- Jap. Yen net asset/liability	-	-			
10- Hedged portion from Jap. Yen risk (-)	-	-			
11- Effect of capitalization (-)					
12- Jap. Yen net effect (9+10+11)		<u> </u>			
TOTAL (4+8+12)	496.709	(496.709)			

(f) Liquidity risk management

Ultimate responsibility for liquidity risk management rests with the Board of Directors, which has built an appropriate liquidity risk management framework for the management of the Company's short, medium and long-term funding and liquidity management requirements. The Company manages liquidity risk by continuously monitoring forecasted and actual cash flows and matching the maturity profiles of financial assets and liabilities and maintaining adequate funds and reserves.

Liquidity risk tables

Conservative liquidity risk management includes maintaining sufficient cash, availability of sufficient amount of borrowings and funds and ability to settle market positions.

The Company manages its funding of actual and forecasted financial obligations by maintaining the availability of sufficient number of high quality loan providers.

The following table details the Company's remaining contractual maturity for its derivative and non derivative financial liabilities. Interests which will be paid on borrowings in the future are included in the relevant columns in the following table.

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NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(f) Liquidity risk management (cont'd)

Liquidity risk tables (cont'd)

31 December 2021

		Total cash outflow				
		per agreement	Less than 3	3-12	1-5 years	More than
Contractual maturity analysis	Book value	(I+II+III+IV)	months (I)	months (II)	(III)	five years (IV)
Non derivative financial liabilities						
Borrowings from banks	4.781.186	4.983.112	660.742	2.142.445	1.355.979	823.946
Lease borrowings	271.635	985.378	9.886	29.656	154.691	791.145
Trade payables	3.141.247	3.141.247	3.141.247	-	-	-
Other financial liabilities (*)	604.034	604.034	604.034	-	-	
Total liabilities	8.798.102	9.713.771	4.415.909	2.172.101	1.510.670	1.615.091
Derivative financial liabilities						
Derivative cash inflows	54.786	1.287.988	1.287.988	-	-	-
Derivative cash outflows	(3.093)	(1.287.988)	(1.287.988)	-	-	-
	51.693	-	-	-	-	-

^(*) Only the financial liabilities under other payables and liabilities are included.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(f) Liquidity risk management (cont'd)

Liquidity risk tables (cont'd)

31 December 2020

		Total cash outflow				
		per agreement	Less than 3	3-12	1-5 years	More than
Contractual maturity analysis	Book value	(I+II+III+IV)	months (I)	months (II)	(III)	five years (IV)
Non derivative financial liabilities						
Borrowings from banks	964.311	1.020.995	65.118	123.139	608.179	224.559
Lease borrowings	231.369	889.770	8.567	23.254	128.657	729.292
Trade payables	1.851.288	1.851.288	1.851.288	-	-	-
Other financial liabilities (*)	176.032	176.032	176.032	-	-	<u>-</u> _
Total liabilities	3.223.000	3.938.085	2.101.005	146.393	736.836	953.851

^(*) Only the financial liabilities under other payables and liabilities are included.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

(Amounts are expressed as Turkish Lira ("TRY Thousand") unless otherwise indicated.)

NOTE 33 – NATURE AND LEVEL OF RISKS DERIVED FROM FINANCIAL INSTRUMENTS (cont'd)

Additional information about financial instruments (cont'd)

(g) Interest rate risk management

The majority of the Company's borrowings are based on floating interest rate terms. In order to manage the exposure to interest rate movements on certain portion of the bank borrowings, the Company uses interest rate swaps and changes floating rates to fixed rates.

In addition, through the use of deposits in which the Company has a right to claim the accrued interest when withdrawn before the predetermined maturity, the Company minimizes the interest rate risk by increasing the share of floating rate denominated assets in its the balance sheet.

Furthermore, for borrowings denominated in foreign currencies, except for US Dollars, the Company minimizes its interest rate risk by leveraging in foreign currencies that bear lower interest rate. In addition, a higher interest rate is applied to the trade receivables with a maturity when compared to the interest rate exposed for trade payables.

Interest rate sensitivity

The following sensitivity analysis is based on forecasted interest rate changes for the liabilities denominated in variable interest rates. The information details the Company's sensitivity to an increase/decrease of 0,50% for US Dollars and EURO, 1,00% TRY denominated interest rates.

Since the principal payments of the loans with floating interest rates are not affected from changes in interest rates, the risk exposure of the Company loans is measured using a sensitivity analysis instead of a Value at Risk calculation.

	31 December	31 December
	2021	2020
Floating Interest Rate Financial Instruments		_
Financial liabilities	2.293.032	664.538

For the year round, if the US Dollars and EURO denominated interest rates increase/decrease by 100 base points in TRY, 50 base points in US Dollars and EURO points in respectively ceteris paribus, the profit before taxation and non-controlling interest after considering the effect of capitalization and hedging would be lower/higher TRY 11.672 thousand (31 December 2020: TRY 3.459 thousand).

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 34 – FINANCIAL INSTRUMENTS (FAIR VALUE AND FINANCIAL RISK MANAGEMENT DISCLOSURES)

Additional information about financial instruments

Categories of the financial instruments and their fair values

		Derivative			
	Financial	financial			
	assets/ liabilities at	instruments	Derivative		
	amortized cost	through other	financial		
	liabilities at	comprehensive	instruments	Carrying	
	amortized cost	income	through profit/loss	value	Note
31 December 2021 Financial Assets	<u></u>				
Cash and cash equivalents	8.824.568	-	-	8.824.568	4
Trade receivables	2.766.145	-	=	2.766.145	9
Financial investments	=	-	361	361	5
Other financial assets	66.618	-	-	66.618	10
Derivative financial instruments	=	13.939	40.847	54.786	7
Financial Liabilities	<u></u>				
Financial liabilities	5.052.821	-	=	5.052.821	8
Trade payables	3.141.247	-	-	3.141.247	9
Other liabilities	604.034	-	-	604.034	10/17/21
Derivative financial instruments	-	-	3.093	3.093	7
31 December 2020					
Financial Assets					
Cash and cash equivalents	38.603	-	-	38.603	4
Trade receivables	1.281.204	-	-	1.281.204	9
Financial investments	-	-	199	199	5
Other financial assets	6.925.071	-	-	6.925.071	10
Financial Liabilities	<u></u>				
Financial liabilities	1.195.680	-	-	1.195.680	8
Trade payables	1.851.288	-	-	1.851.288	9
Other liabilities	176.032	-	-	176.032	10/17/21

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Estimated fair values of financial instruments have been determined by the Company by using available market information and appropriate valuation methodologies. However, judgement is necessarily required to interpret market data. Accordingly, estimates presented herein are not necessarily indicative of the amounts the Company could realise in a current market exchange.

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NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2021

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NOTE 34 – FINANCIAL INSTRUMENTS (FAIR VALUE AND FINANCIAL RISK MANAGEMENT DISCLOSURES) (cont'd)

Additional information about financial instruments (cont'd)

Categories of the financial instruments and their fair values (cont'd)

31 December 2021					
		Fair value level as of			
Financial asset and liabilities at fair value		re	porting date		
	Book Value	Level 1	Level 2	Level 3	
Financial assets and liabilities at fair value through profit/loss					
Derivative financial assets	40.847	_	40.847	_	
Derivative financial liabilities	(3.093)	-	(3.093)	-	
Financial assets and liabilities at fair value through other comprehensive income/expense					
Derivative financial assets Derivative financial liabilities	13.939	-	13.939	-	
Total	51.693	-	51.693	-	

As of 31 December 2020, the Company does not have financial assets and liabilities indicated at their fair value.

First Level: Quoted (non adjusted) prices in active markets for identical assets or liabilities.

Second Level: Other valuation techniques for which all inputs which have a significant effect on the recorded fair value are observable, either directly or indirectly.

Third Level: Valuation techniques which use inputs which have a significant effect on the recorded fair value that are not based on observable market data.

NOTE 35 – SUBSEQUENT EVENTS

In accordance with the Tax Procedure Law No. 7352 and the Law on the Amendment of the Corporate Tax Law published in the Official Gazette dated 29 January 2022 and numbered 31734, the application of inflation adjustment in the financial statements prepared according to the tax procedure law was postponed to 31 December 2023.

NOTE 36 – OTHER ISSUES AFFECTING THE FINANCIAL STATEMENTS MATERIALLY OR THOSE REQUIRED TO BE DISCLOSED FOR A CLEAR, UNDERSTANDABLE AND INTERPRETABLE PRESENTATION

Convenience translation to English:

As at 31 December 2021, the accounting principles described in Note 2 (defined as Turkish Accounting Standards/Turkish Financial Reporting Standards) to the accompanying financial statements differ from International Financial Reporting Standards ("IFRS") issued by the International Accounting Standards Board with respect to the application of inflation accounting, certain reclassifications and also for certain disclosures requirement of the POA/CMB. Accordingly, the accompanying financial statements are not intended to present the financial position and results of operations in accordance with IFRS.