



ABSTRACT OF THE POLICY ON THE PROHIBITION OF INSIDER TRADING AND MARKET MANIPULATION

KELER Central Securities Depository Ltd.

The purpose of KELER Central Securities Depository Ltd (hereinafter referred to as KELER) is to minimise the possibility of insider trading and market manipulation. Therefore, KELER has elaborated a policy on compliance with the relevant legal requirements and has determined KELER's responsibilities with regard to the implementation of the relevant laws.

KELER has placed and continues to place particular emphasis on the establishment and operation of a system for reporting potential market abuse in connection with transactions in the securities markets covered by its services, in particular in order to prevent insider dealing and market manipulation in compliance with the Community legislation on abuse.

KELER prohibits the unauthorised disclosure or transmission of inside information and has a general expectation that inside information should only be disclosed when and to the extent strictly necessary for the performance of a job-related task.

It is prohibited to engage in or attempt to engage in insider dealing, to engage in any other form of insider dealing, or to enter into any transaction using inside information in the name or for the benefit of KELER or itself.

KELER is committed to the prevention of insider trading and market manipulation, and therefore expects its employees to report any data, facts or circumstances that indicate insider trading or the preparation thereof to the competent department without delay.

KELER shall monitor compliance with the provisions and obligations set out in its internal rules and ensure that KELER employees are familiar with the legal provisions on insider trading and market abuse, learn to recognise business relationships and transactions that enable or facilitate insider trading and market abuse, and are able to act appropriately in cases of suspicion of insider trading and market abuse.

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