



## ARSLAN ALÜMİNYUM MODERN SLAVERY POLICY

POL 48

1 / 2

### Purpose

The purpose of this policy is to define the principles and practices to be followed to prevent modern slavery, human trafficking, and child labor across all operations and the supply chain of Arslan Alüminyum A.Ş., and to establish an ethical, fair, and respectful working environment that honors human rights.

This policy has been prepared to ensure full compliance with national and international legislation, including the UK Modern Slavery Act 2015.

### Scope

This policy encompasses:

All employees of Arslan Alüminyum A.Ş.,

The executive management team,

Suppliers and business partners,

All affiliates and subcontractors.

Compliance with the principles outlined in this policy is mandatory for all stakeholders.

### Responsibilities

Top Management: Responsible for ensuring the implementation of the policy, allocating necessary resources, and auditing its overall effectiveness.

Human Resources Directorate: Responsible for organizing training sessions, receiving grievances/complaints, and managing the ethics committee process.

Supply Chain Management: Responsible for monitoring suppliers' compliance with policy principles, conducting audits, and performing risk assessments.

Employees: Obligated to act in accordance with the policy principles, proactively report suspicious situations, and participate in awareness initiatives.

### Principles and Commitments

Arslan Alüminyum is committed to the following principles:

Zero-Tolerance Approach: A zero-tolerance policy is strictly adopted against modern slavery, human trafficking, and child labor.

Fair and Safe Working Environment: A safe, fair, and respectful working environment is provided for all employees.

Legal and International Compliance: Full compliance with the Labor Law of the Republic of Turkey and International Labour Organization (ILO) conventions is essential.

Supplier Responsibility: Suppliers are explicitly expected to comply with the "Arslan Alüminyum Supplier Code of Conduct."

Training and Awareness: Regular training sessions regarding modern slavery, ethical behavior, and human rights are provided to personnel.

| PREPARED BY                   | APPROVED BY            |
|-------------------------------|------------------------|
| ARGE VE KALİTE GÜVENÇE MÜDÜRÜ | GENEL MÜDÜR YARDIMCISI |



## ARSLAN ALÜMİNYUM MODERN SLAVERY POLICY

POL 48

2 / 2

Transparency: Operational processes and performance outcomes regarding these implementations are shared openly and transparently with stakeholders.

### Implementation

Risk Assessment: Modern slavery and human trafficking risks within the supply chain are regularly analyzed, and necessary preventive measures are systematically implemented.

Auditing and Monitoring: Supplier practices are audited periodically; corrective action plans (CAPs) are prepared and tracked in cases of detected non-compliance.

Training Programs: Annual awareness and ethics training programs are organized and deployed for all employees.

Grievance and Reporting Mechanism: In the event of a suspected case of modern slavery or any ethical violation, employees can submit a report directly to the Human Resources Directorate or via email to etik@arslanaluminum.com. Reports can be filed anonymously, are evaluated under strict confidentiality, and are formally resolved by the Ethics Committee.

### Monitoring and Review

This policy is reviewed at least once a year and updated if deemed necessary.

The effectiveness of the policy is monitored through internal audit results, grievance logs, training participation rates, and supplier audit reports. Continual improvement is executed based on the findings and data points obtained.

### Effective and Review Dates

Effective Date: 12.02.2026

Review Date: 12.02.2026

| PREPARED BY                   | APPROVED BY            |
|-------------------------------|------------------------|
| ARGE VE KALİTE GÜVENCE MÜDÜRÜ | GENEL MÜDÜR YARDIMCISI |