



SCRAP MANAGEMENT AND CIRCULAR ECONOMY POLICY

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Purpose

As Arslan Alüminyum A.Ş., in line with our goal for a sustainable world, we commit to conducting all our activities with a sense of environmental, social, and governance (ESG) responsibility.

This policy aims to adopt circular economy principles within our production processes, to continually improve our scrap management practices, and to contribute to environmental sustainability through recycling-oriented R&D activities. Within this scope, our primary objectives are:

- Maximizing alignment with the circular economy,
- Increasing recycling rates and minimizing the generation of scrap,
- Mitigating the environmental impacts of scrap materials,
- Strengthening recovery and recycling awareness among our stakeholders,
- Providing maximum contribution to sustainable environmental initiatives.
- **Scope**

This policy encompasses:

- All production facilities belonging to Arslan Alüminyum A.Ş.,
- All employees and executives,
- Suppliers, subcontractors, and business partners involved in scrap management processes.

Our Board of Directors commits to the full implementation of the requirements specified in this policy and expects the same level of responsibility from all stakeholders.

Responsibilities

- **Top Management:** Responsible for ensuring the execution of the policy, allocating necessary resources, and monitoring overall performance.
- **Production and R&D Units:** Responsible for conducting process development activities to reduce scrap generation and increase recycling yields.
- **Environmental Management Team:** Responsible for ensuring that scrap management processes comply with legal regulations, statutory legislation, and environmental standards.
- **Human Resources:** Responsible for planning and implementing training programs to enhance employee awareness.
- **All Employees:** Obligated to act with environmental and quality awareness during scrap management processes and to proactively submit improvement proposals.

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Principles and Commitments

As Arslan Alüminyum A.Ş., we adhere to the following principles:

- **Regulatory Compliance:** Full compliance with all applicable national and international environmental and waste management legislation is ensured.
- **Resource Efficiency:** High raw material and energy efficiency practices are strictly preferred across R&D and production processes.
- **Scrap Minimization:** Continual improvement activities are carried out to reduce the amount of scrap generated within our operational processes.
- **Recycling-Oriented Approach:** Systematic projects are developed for the 100% collection, recycling, and reuse of scrap materials.
- **Segregation and Reuse:** Opportunities for the segregation and sorting of scrap into distinct alloys and grades are evaluated and integrated into appropriate manufacturing processes.
- **Training and Awareness:** Regular training sessions regarding scrap management, recycling, and environmental sustainability are provided to all personnel.
- **Continual Improvement:** Scrap management performance is regularly measured, analyzed, and improvement plans are systematically deployed.

Implementation

- Scrap management processes are executed in an integrated manner with the ISO 14001 Environmental Management System (EMS).
- Process-based key performance indicators (KPIs) are established to systematically increase recycling rates.
- Scrap collection, storage, and disposal processes are managed in an eco-friendly manner.
- Information sharing and awareness campaigns are regularly organized with stakeholders.
- Increasing the utilization rate of waste scrap and reintegrating it into the production cycle is actively supported through dedicated R&D activities.

Monitoring and Review

Scrap management performance is regularly measured and reported. The applicability and suitability of this policy is reviewed at least once a year and updated when necessary. Improvement activities are tracked via environmental management system internal audits, performance indicators, and stakeholder feedback.

Effective and Review Dates

Effective Date: 12.02.2026

Review Date: 12.02.2027

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