



SUSTAINABLE SUPPLY CHAIN POLICY

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Purpose

The purpose of this policy is to ensure that Arslan Alüminyum A.Ş. adopts a sustainable approach in its supply chain by observing environmental, social, and ethical values, to establish relationships built on trust with suppliers and business partners, and to promote behavior compliant with these principles.

Scope

This policy encompasses all suppliers, business partners, subcontractors, and all stakeholders involved in the supply chain of Arslan Alüminyum A.Ş. Furthermore, it comprehensively covers all activities related to sourcing from Conflict-Affected and High-Risk Areas (CAHRA) and the utilization of conflict minerals.

Responsibilities

- **Top Management:** Responsible for ensuring and continually improving sustainable and ethical practices within the supply chain.
- **Procurement and Supply Unit:** Responsible for auditing suppliers' compliance with the policy, implementing evaluation criteria, and tracking necessary improvements.
- **Suppliers and Business Partners:** Obligated to comply with the requirements of this policy, report violations to Arslan Alüminyum, and ensure ethical conduct across the supply chain.
- **CAHRA Compliance Officer / Committee:** Responsible for regularly monitoring high-risk regions (CAHRA) within the supply chain, collecting information on origin and smelters from suppliers to carry out risk analyses in accordance with OECD standards, and reporting to senior management in the event of high-risk situations.

Principles and Commitments

Arslan Alüminyum A.Ş. and its suppliers commit to fulfilling the following principles and core requirements:

- **Employee Rights:** Employee rights are protected in full compliance with applicable legislation; fair, safe, and healthy working conditions are provided.
- **Discrimination and Harassment:** No discrimination or harassment based on religion, language, race, color, gender, sexual orientation, age, or any other personal characteristic shall be tolerated.
- **Forced and Child Labor:** Forced, bonded, or child labor is strictly prohibited; all employment decisions must be based on free will.
- **Occupational Health and Safety:** All necessary measures are taken to prevent occupational accidents and diseases; required training, safety protocols, and protective equipment are systematically provided.
- **Environmental Compliance:** All operations are conducted in compliance with local environmental laws and international standards; the protection of natural resources, waste management, clean energy utilization, and recycling are treated as priorities.

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- **Bribery and Corruption:** Offering, giving, or accepting bribes is strictly prohibited, and no form of corruption is tolerated; all activities must align with applicable anti-corruption laws.
- **Conflicts of Interest:** Conflicts of interest must be actively avoided, and any potential situations must be reported immediately; inappropriate gifts, outside of standard commercial or promotional materials, shall not be given or accepted.
- **Ethical and Legal Situations:** Any unethical, non-compliant, or unlawful situations must be reported through the designated channels.
- **Resource Management:** Sourcing and resources within the supply chain are managed in an effective, streamlined, and integrated manner.
- **Continual Improvement:** Supply chain processes are continuously developed and enhanced through innovative methodologies.
- **Grievance Procedures and Record-Keeping:** All grievances and complaints are thoroughly investigated; all commercial and operational transactions are recorded accurately, fairly, and in a timely manner.
- **Protection of Confidential Information:** Proprietary information, commercial secrets, know-how, and financial data are strictly protected.
- **Conflict Minerals:** The use of conflict minerals is strictly prohibited; sourcing from high-risk areas (CAHRAs) is restricted, and activities that contribute to illegal financing are strictly banned.
- **Conflict-Affected and High-Risk Areas (CAHRA):** Arslan Aluminium, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains (Annex II), categorically rejects the sourcing of aluminium and other raw materials that directly or indirectly finance illegal armed groups in conflict-affected or high-risk areas (CAHRA), or that contribute to human rights abuses, war crimes or forced labour in such regions.
- **Supply Chain Traceability and Chain of Custody:** Our suppliers, are obliged to transparently document the origin (country/region) and producer foundry/smelter information of the primary (ingot/billet) and secondary (scrap) aluminium and alloy elements they supply to Arslan Aluminium, and to provide verifiable evidence upon request.
- **Risk Mitigation and Management of Commercial Relationships:** Should a risk or suspected violation under CAHRA be identified within the supply chain, risk-mitigating measures are taken in collaboration with the supplier. Commercial relationships with suppliers who fail to comply with risk mitigation plans, do not share information transparently, or are involved in serious human rights violations are suspended or terminated entirely.
- **Complaints and Reporting Mechanism:** A transparent and accessible reporting/complaints mechanism is operated, enabling all stakeholders (employees, suppliers, third parties) to report CAHRA violations, human rights abuses and unethical practices whilst their identities remain confidential; all reports are thoroughly investigated.

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Implementation

Suppliers formally declare that they have read, understood, and accepted the terms of this policy. Suppliers are required to communicate these policy requirements to all their personnel and subcontractors, ensuring full operational compliance. Arslan Alüminyum monitors the field implementation of the policy through targeted supply chain audits, training sessions, and mandatory contractual provisions.

Monitoring and Review

Every stage of the supply chain is regularly monitored, and compliance with the policy framework is systematically audited. Identified non-conformities are corrected immediately, and constructive feedback is provided to suppliers to ensure alignment. The policy is reviewed at least every five years or as deemed necessary, and updated in accordance with evolving international standards.

Effective and Review Dates

Effective Date: 12.02.2026

Review Date: 12.02.2027

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