

ARSLAN ALÜMİNYUM A.Ş. MODERN SLAVERY POLICY

POL 48 1/3

REVISION INFORMATION

REVISION DATE	REVISION NO	DESCRIPTION
19.08.2024	00	FIRST RELEASE

PREPARER	APPROVER
R&D AND QUALITY ASSURANCE MANAGER	DEPUTY GENERAL MANAGER



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POL 48 2/3

We publish this policy as a reflection of the core values we embrace in conducting our business and to prevent modern slavery within Arslan Alüminyum A.Ş. and our supply chain, in accordance with the UK Modern Slavery Act 2015.

Policy Statement

Slavery, human trafficking, and child labor are serious crimes under national and international legislation. At Arslan Alüminyum A.Ş., we adopt a zero-tolerance policy towards modern slavery in all our business areas and supply chain, and we maintain a transparent management approach in this regard. As Arslan Alüminyum, we take steps at every stage of our processes to prevent such crimes, and we regularly monitor and ensure that our policy is effectively implemented both within our company and by all our stakeholders. We review and update our policy annually, ensuring that our employees and suppliers embrace this awareness.

Responsibilities

This policy applies to all employees and stakeholders within Arslan Alüminyum A.Ş. The legal regulations, ethical and professional principles, and universal rules that our employees and suppliers are obliged to comply with are outlined in the Arslan Alüminyum Code of Conduct and Supplier Code of Conduct. We work continuously to ensure that these principles are adhered to.

Our commitments to ensuring that our suppliers comply with our policies, expectations, and legal requirements, and to reducing the risk of modern slavery in our commercial activities are as follows:

- Continuously assessing our activities and supply chain to eliminate risks related to modern slavery,
- Providing necessary training and raising awareness to ensure that our employees comply with the Arslan Alüminyum Code of Conduct,
- Reviewing and auditing our suppliers' practices to ensure compliance with the Arslan Alüminyum Supplier Code of Conduct.

We prioritize safety at the highest level for all our employees and ensure a fair working environment. We diligently comply with the Labor Law and the International Labor Organization (ILO) agreements to which the Republic of Turkey is a party regarding the prohibition of child labor. In this context, we closely monitor the compliance of our suppliers with the laws of the countries in which they operate.

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Training

We prioritize providing regular training to our employees to raise their awareness about modern slavery. To mitigate the risk of modern slavery in our supply chain, we aim to keep the awareness level of our employees at the highest level.

Risk Assessment and Management

We inform all employees and stakeholders in our supply chain about our policy, guiding them to take necessary precautions and make adjustments, and we ensure proper follow-up. In the event that a violation or suspicion of a violation of our policy is detected, complaints can be reported to the Human Resources Department or at the email address etik@arslanalüminyum.com. While evaluating complaints, we receive notifications anonymously, manage the process with confidentiality, and finalize decisions through our Ethics Committee. We share the decisions we make and our action plans with the relevant parties in line with our transparency principle.

Looking Ahead

We are proud of the progress we have made in respecting and promoting human rights throughout Arslan Alüminyum A.Ş. This progress also includes our actions to prevent and address modern slavery risks. As our program grows, we aim to expand our current initiatives and priorities and make greater efforts across the company to tackle modern slavery risks. Looking ahead, we will continue to strengthen our commitments in the following key areas:

- Regularly reviewing and updating our policies and assessment processes,
- Expanding our collaborations with organizations that combat modern slavery,
- Increasing our efforts in training and capacity building,
- Regularly reviewing and improving our supply chain due diligence efforts.

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