

	<b>Human Rights Policy</b>	Document No	UYM.PO.11.E
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		Information Class	General Access

# Human Rights Policy

Version

**1.2**

Controller

**Hülya CİVELEK**

Approved by

**Sarp TARHANACI**

Date

**March 2025**

Next Review

**March 2026**

# Human Rights Policy

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## 1. Introduction and Commitment

At Alek Metal Rafineri, we are committed to respecting and promoting human rights as enshrined in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs), and relevant International Labour Organization (ILO) Conventions.

Our approach to human rights is grounded in ethical business conduct, legal compliance, and the continuous improvement of our supply chain and internal systems. We recognize that businesses have a duty to respect human rights and to avoid causing, contributing to, or being linked with adverse human rights impacts through their own activities or relationships.

## 2. Scope

This policy applies to:

- All employees, contractors, and directors of Alek Metal Rafineri;
- All suppliers, subcontractors, and commercial partners across our global supply chain;
- All sites, including operational, production, logistics, and administrative units.

## 3. Our Core Human Rights Principles

### 3.1 Prohibition of Child Labour

We strictly prohibit child labour as defined by ILO Convention No. 138 and No. 182.

- The minimum age for employment is 16 or the age for completion of compulsory education, whichever is higher.
- No person under 18 shall be employed in hazardous work or work that interferes with their education or development.
- We require all our suppliers and contractors to adhere to these standards and conduct regular age verification procedures.

### 3.2 Prohibition of Forced Labour and Modern Slavery

We strictly prohibit all forms of forced labour, human trafficking, and modern slavery in accordance with ILO Convention No. 29, the UK Modern Slavery Act (2015), and the UN Palermo Protocol.

Modern slavery includes:

- Debt bondage,
- Forced or compulsory labour,

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- Retention of identity documents,
- Human trafficking for any purpose.

All workers at Alek Metal Rafineri are employed freely, without coercion or threat. Workers must never be charged recruitment fees or forced to work against their will. Violation of this policy by any supplier will result in immediate contract termination.

### 3.3 Non-Discrimination and Equal Opportunity

We promote a workplace that is inclusive, respectful, and free from any form of discrimination. Employment decisions are based solely on qualifications, performance, and business needs.

We do not tolerate discrimination based on:

- Race or ethnicity,
- Gender or gender identity,
- Religion or beliefs,
- Sexual orientation,
- Disability,
- Age,
- Nationality,
- Marital or parental status,
- Political affiliation.

Equal opportunities shall be guaranteed in hiring, training, remuneration, promotion, and termination processes.

### 3.4 Freedom of Association and Collective Bargaining

We respect the right of all employees to form, join, or not join trade unions and other lawful associations of their own choosing, and to engage in collective bargaining, in line with ILO Conventions No. 87 and 98.

Where local laws restrict freedom of association, we will facilitate alternative means of employee representation and dialogue.

### 3.5 Workplace Health, Safety and Well-being

We are committed to providing a healthy and safe workplace for all employees and contractors. Our occupational health and safety (OHS) practices comply with ISO 45001, local legislation, and industry best practices.

- Risk assessments and emergency response plans are maintained regularly.
- All employees receive safety training relevant to their roles.
- Safety audits and inspections are conducted periodically.

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### 3.6 Fair Wages and Working Hours

We respect the right of all workers to receive fair wages, in line with local minimum wage laws and industry standards. Overtime shall be voluntary and compensated in accordance with legal requirements.

We do not permit:

- Excessive working hours,
- Wage deductions as disciplinary measures,
- Withholding of pay or benefits unlawfully.

### 3.7 Protection of Indigenous Rights and Local Communities

In line with UNDRIP (United Nations Declaration on the Rights of Indigenous Peoples), we respect the rights, customs, and cultures of indigenous communities and vulnerable populations potentially impacted by our operations or suppliers.

## 4. Human Rights Due Diligence Framework

We apply the OECD Due Diligence 5-Step Framework across our supply chain and business relationships. This includes:

1. Establishing strong company management systems (policies, codes of conduct, risk assessments);
2. Identifying and assessing risks in the supply chain;
3. Designing and implementing risk mitigation strategies;
4. Independent monitoring and verification through audits, site visits, and interviews;
5. Reporting publicly on due diligence actions and progress.

Due diligence is conducted:

- Before establishing any business relationship;
- On an ongoing basis during the relationship;
- When there are changes in supply chain risk levels.

## 5. Training and Awareness

We provide ongoing training on human rights, ethical sourcing, and responsible supply chain practices to:

- All employees, especially procurement, compliance, and logistics staff;
- Suppliers and subcontractors;
- Management and executives.

## 6. Grievance Mechanisms and Whistleblowing

We maintain accessible, confidential, and secure grievance channels to allow employees, suppliers, and third parties to report:

- Human rights abuses;

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- Ethical violations;
- Unsafe working conditions;
- Any non-compliance with this policy.

All grievances are handled with strict confidentiality and without retaliation. Corrective actions are taken where necessary.

## 7. Monitoring, Auditing and Enforcement

We regularly monitor compliance through:

- Internal audits,
- Third-party assessments,
- Supplier scorecards and certifications (e.g., RJC-CoC, LBMA RGG),
- Worker feedback and site interviews.

Breaches of this policy may result in:

- Remediation plans,
- Contractual penalties,
- Suspension or termination of business relationships.

## 8. References and Standards

This policy is aligned with the following international standards and guidance documents:

- Universal Declaration of Human Rights;
- UN Guiding Principles on Business and Human Rights (UNGPs);
- ILO Conventions Nos. 29, 87, 98, 105, 111, 138, 182;
- OECD Due Diligence Guidance for Responsible Mineral Supply Chains (2013);
- LBMA Responsible Gold & Silver Guidance (2022–2023);
- World Gold Council Conflict-Free Gold Standard (2012);
- Responsible Jewellery Council Code of Practices and Chain of Custody (2019–2024);
- UK Modern Slavery Act (2015);
- UNDRIP (2007);
- FATF Recommendations.

## 9. Approval and Review

This Human Rights Policy has been formally approved by the Board of Alek Metal Rafineri on 15 January 2024.

It will be reviewed and updated annually or as required based on operational, regulatory, or legal developments.

Approved by: Board of Directors Alek Metal Rafineri A.Ş.