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	Responsible Sourcing Policy	

RESPONSIBLE SOURCING POLICY

Scope

This policy applies to current and potential suppliers of copper-containing materials to the Eti Bakır Samsun facility.

Introduction

Eti Bakır A.Ş. is a leader in its sector in using natural resources to create economic value and ensuring sustainability. The company consistently requires its suppliers to conduct business ethically, uphold the highest ethical standards, respect labour and human rights, and act responsibly towards the environment.

Eti Bakır A.Ş. has developed this Responsible Sourcing Policy in line with the Model Supply Chain Policy in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our Supply Chain Commitment.

At Eti Bakır A.Ş., we commit to:

- Carefully checking that our suppliers comply with the OECD Due Diligence Guidance, national and international legal requirements and corporate ethics policies;
- Following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) to identify, mitigate and report risks in our value chain;
- We commit to implement the five-step due diligence process defined in the OECD Guidance Annex I
- We commit to identify and regularly revisit risk for adverse social and environmental impacts within our value chain.
- Checking whether our suppliers source minerals from conflict-affected areas;
- Not gaining any profit or benefit from suppliers whose practices do not comply with the OECD Due Diligence Guidance;
- Not tolerating any direct or indirect support to non-state armed groups through mineral extraction, transport, trade, processing or export.

And we will support our suppliers and business partners to comply with the decisions in the same way.

Eti Bakır A.Ş. applies a **Zero Tolerance Policy** to unethical business conduct, bribery, corruption and forced labour.

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Requirements for Suppliers

As part of managing our risks and exposure in relation to minerals extracted from conflict-affected and high-risk areas, our expectations of suppliers and business partners are as follows:

- There shall be no torture or cruel, inhuman or degrading treatment in the sourcing process;
- Business partners shall not engage in any form of forced or compulsory labour;
- The worst forms of child labour shall not occur;
- There shall be no other gross human rights abuses, such as sexual violence;
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide should not be existed
- No party shall illegally levy taxes or extort payments at mine sites, along transportation routes or at points where minerals are traded;
- No party shall illegally tax or extort payments from intermediaries, export companies or international traders in the sourcing process;
- Where any company in our supply chain contracts public or private security forces, those forces shall not act in a manner that undermines security or violates human rights;
- Any company in our supply chain makes a contract with public or private security forces, these security forces do not act against Security and Human Rights
- Preventing adverse impacts from public or private security forces on vulnerable groups within the mineral supply chain, particularly artisanal and small-scale miners (ASM);
- No bribes shall be offered to conceal or misrepresent the origin of minerals or to mislead the public regarding taxes, fees and royalties paid to governments in connection with mineral extraction, trade, processing, transport and export;
- Eliminating money laundering where there is a risk of money laundering arising from or connected to the extraction, trade, processing, transportation, or export of minerals;

With regard to these risks, where we identify that a supplier has breached the OECD Due Diligence Guidance, we will not tolerate such breaches and will immediately suspend and terminate our relationship with that supplier.

Occupational Health and Safety and the Environment

Eti Bakır A.Ş.'s commitment to sustainability includes the efficient use of resources, protection of the environment, and provision of healthy and safe workplaces. Eti Bakır A.Ş. expects its suppliers to make similar commitments to continually improve their environmental, health and safety performance.

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Ensuring Occupational Health and Safety: Suppliers shall provide a safe and healthy workplace for their directly and indirectly employed workers through appropriate controls, training, work procedures and personal protective equipment. Suppliers shall comply with all health and safety laws applicable to the workplace.

Respect for the Environment: Suppliers shall comply with applicable environmental laws and have systems in place to ensure the safe management of waste, air emissions and wastewater discharges. Suppliers should continually seek to minimise their environmental impact by using recycled materials and make continual improvements in resource efficiency.

Expectations Regarding the Supplier Code of Business Ethics

Eti Bakır A.Ş. expects its suppliers to implement systems and controls, including policies, training, monitoring and audit mechanisms, to promote compliance with applicable national and international laws and the principles set out in this Code. Suppliers should also apply these or similar principles to the subcontractors and suppliers with whom they work when providing goods and services to Eti Bakır A.Ş.

Eti Bakır A.Ş. reserves the right to assess and monitor suppliers' compliance with this Code. It may require suppliers that do not comply with this Code to take corrective action, or such suppliers may not be considered approved suppliers for future business.

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