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		İlk Yayın Tarihi	28.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/6

Financial Year: 2024-2025

COMPANY OVERVIEW

Alpha Plus operates its production facility and administrative office at the following address:

Yenibosna Merkez Mah. Kuyumcular Sok. No:4, Vizyon Park Merkez Plaza C1 Blok, Kat: 4/420 Bahçelievler/
İstanbul, Türkiye

This Annual Responsible Business Conduct Report has been prepared in accordance with the Responsible Jewellery Council (RJC) Code of Practices (COP) 2024.

The report summarizes Alpha Plus's performance, initiatives, and continuous improvement efforts across ethical business conduct, responsible sourcing, human rights, environmental management, and corporate governance.

1. Alignment with Vision and Mission

Alpha Plus aims to lead the jewellery sector as an alloy manufacturer by upholding integrity, transparency, respect for human rights, and environmental responsibility. Our mission is to maintain a transparent, accountable, and conflict-free supply chain supported by robust policies and management systems.

During the reporting period, significant progress was made in embedding RJC principles into operational and governance frameworks, reinforcing ethical conduct as a core component of corporate culture.


2. Responsible Sourcing – Strategic Initiatives

Alpha Plus applies rigorous due diligence procedures both prior to onboarding suppliers and throughout ongoing business relationships.

- Suppliers are assessed based on ethical, legal, human rights, and environmental criteria
- Non-compliant suppliers are rejected or disengaged
- Sourcing practices align with the OECD Due Diligence Guidance and Annex II principles
- The RJC Representative monitors compliance, tracks issues, and ensures corrective actions

2024-2025 KPI Data

- 22 suppliers assessed
- 3 suppliers classified as high-risk
- 2 suppliers disengaged due to non-compliance
- 4 suppliers subject to corrective action plans (CAPs)
- 100% of suppliers underwent **Customer Due Diligence (CDD)**

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3. Compliance with RJC COP 2024

Alpha Plus applies the **OECD 5-Step Due Diligence Framework**:

1. Establish strong management systems
2. Identify and assess risks
3. Design and implement risk mitigation strategies
4. Conduct independent audits and monitoring
5. Report annually on due diligence

These measures ensure both compliance and ethical integrity across operations.

3A. Risk Assessment and Classification

Alpha Plus adopts a risk-based approach to supply chain management.

Risk Categories

- **High Risk:** Conflict-affected and high-risk areas (CAHRA)
- **Medium Risk:** Developing countries
- **Low Risk:** OECD and low-risk jurisdictions

2024-2025 Risk Distribution

- 8% High Risk
- 40% Medium Risk
- 52% Low Risk


Enhanced Due Diligence (EDD) is applied to all high-risk suppliers.

3B. OECD Annex II Compliance (Supply Chain Policy)

Alpha Plus is committed to full compliance with the OECD Due Diligence Guidance, including **Annex II Model Supply Chain Policy for Responsible Mineral Supply Chains**.

The company maintains a zero-tolerance approach to the following:

- Any form of torture, cruel, inhuman, or degrading treatment
- Forced or compulsory labour
- The worst forms of child labour
- Human rights abuses and violations
- War crimes, crimes against humanity, or genocide

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Alpha Plus will **immediately suspend or discontinue engagement** with suppliers where there is reasonable evidence of:

- Direct or indirect support to **non-state armed groups**
- Illegal control of mining sites, transportation routes, or trade
- Unlawful taxation, extortion, or bribery

In addition, Alpha Plus strictly prohibits:

- Bribery and fraudulent misrepresentation of mineral origin
- Money laundering and non-compliance with AML regulations
- Non-payment of taxes, fees, and royalties to governments

Risk Mitigation Measures

Where risks are identified, Alpha Plus:

- Conducts enhanced due diligence (EDD)
- Requires suppliers to implement corrective action plans (CAPs)
- Monitors progress and timelines
- Terminates business relationships if risks are not mitigated

2024-2025 Annex II Monitoring Data

- 0 cases linked to armed group financing
- 0 severe human rights violations identified
- 3 high-risk suppliers monitored under enhanced due diligence
- 2 suppliers disengaged due to compliance concerns

4. Corporate Governance and Policy Implementation

Alpha Plus maintains a robust governance structure:


- Responsible sourcing and due diligence policies are fully implemented
- Zero tolerance approach to non-compliance
- Policies are approved, communicated, and actively enforced by senior management

This framework ensures accountability and ethical behavior at all levels.

5. Stakeholder Engagement and Transparency

Alpha Plus promotes transparency through active stakeholder engagement:

- Annual stakeholder engagement activities conducted
- Awareness of OECD Due Diligence and supply chain policies promoted
- Open dialogue maintained with suppliers and business partners

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5A. Grievance Mechanism

Alpha Plus has established a confidential and secure grievance mechanism:

- Anonymous reporting is available
- All grievances are recorded and investigated
- Zero tolerance for retaliation

2024-2025 Data

- 2 grievances received
- 2 grievances resolved
- No human rights violations identified

6. Financial Integrity and Accountability

- Financial records are maintained accurately and transparently
- Audited financial statements comply with Turkish regulations
- AML/CFT obligations are implemented in line with MASAK requirements
- Sales increased by **21.36%** during the reporting period

7. Promotion of Responsible Practices

Alpha Plus actively promotes responsible practices among suppliers:


- Encouraging adoption of due diligence processes
- Communicating expectations on ethics and human rights
- Assessing potential and actual human rights impacts

7A. Training and Awareness

Alpha Plus ensures employee awareness through structured training programs:

2024-2025 Training Data

- 100% of employees received RJC and ethics training
- 4 training sessions conducted
- Average training duration: 6 hours per employee

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8. Environmental Management and Occupational Health & Safety

- Full compliance with Turkish environmental and OHS regulations
- Regular risk assessments conducted
- Initiatives implemented to reduce environmental impact

2024-2025 Environmental Data

- Electricity consumption: **185,000 kWh**
- Recycling rate: **62%**
- Hazardous waste disposed via licensed contractors

8A. Human Rights Commitment

Alpha Plus is fully committed to internationally recognized human rights:

- Zero tolerance for child labour
- Zero tolerance for forced labour
- Zero tolerance for discrimination and harassment

2024-2025 Data

- Child labour cases: 0
- Forced labour cases: 0
- 100% employee age verification completed


9. Continuous Improvement

- Continuous improvement initiatives embedded across operations
- Active participation in RJC-related programs
- Ongoing benchmarking against industry best practices

10. Future Outlook

Alpha Plus will continue to:

- Strengthen policies and management systems
- Align with evolving RJC standards
- Enhance transparency and sustainability performance

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11. Conclusion

This report demonstrates Alpha Plus's commitment to RJC COP 2024 version not only at a policy level but through **measurable performance indicators and evidence-based practices**.

Through strong governance, responsible sourcing, stakeholder engagement, and continuous improvement, Alpha Plus maintains high standards of responsible business conduct.

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.

Alfa Metal Alaşım San. ve Tic. Ltd. Şti.



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