

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>Due Diligence Report</b>	Doküman No	RPR002
		İlk Yayın Tarihi	28.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/4

**Financial Year:** 2024-2025

## 1. Introduction and Scope

This Due Diligence Report forms an integral part of Alpha Plus's Annual Responsible Business Conduct Report (2024–2025) and outlines the company's approach to identifying, assessing, preventing, and mitigating risks within its operations and supply chain.

The scope of this report includes all activities related to:

- Alloy production from precious and non-precious metals
- Sales and export operations
- All upstream and downstream supply chain relationships

## 2. Due Diligence Framework

Alpha Plus applies the **OECD 5-Step Due Diligence Framework** in accordance with RJC COP 2024 requirements.

### Applicable Standards

- OECD Due Diligence Guidance for Responsible Supply Chains
- OECD Annex II Model Supply Chain Policy
- RJC Code of Practices (COP) 2024

## 3. Step 1 – Establish Strong Management Systems

Alpha Plus has established robust management systems to support responsible sourcing and due diligence:

- Supply Chain Compliance and Responsible Sourcing Policies
- Appointment of an RJC Representative by the CEO
- Supplier contractual clauses covering ethics, human rights, and compliance
- Record-keeping systems for supplier data, origin documentation, and risk assessments
- A grievance and whistleblowing mechanism accessible to internal and external stakeholders

These systems are reviewed annually by senior management.

## 4. Step 2 – Identify and Assess Risks In The Supply Chain

Alpha Plus conducts risk identification and assessment across its supply chain, focusing on:

- Human rights risks (forced labour, child labour, discrimination)
- Conflict financing and involvement of armed groups
- Corruption, bribery, money laundering, and sanctions risks
- Environmental and occupational health and safety risks

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### Risk Assessment Methodology

- Review of supplier self-assessment questionnaires
- Country and geographic risk screening (including CAHRA analysis)
- Monitoring of adverse media and publicly available information
- Verification of supplier documentation and declarations

### 2024-2025 Supplier Due Diligence Data

- **22 suppliers assessed**
- 100% of suppliers subject to Customer Due Diligence (CDD)
- 0 high-risk suppliers identified
- 0 verified Annex II red flags detected
- 0 suppliers requiring Enhanced Due Diligence (EDD)

### Risk Profile (2024–2025)

Due to the sourcing model and absence of direct gold supply (LBMA-aligned sourcing approach), the overall supply chain has been assessed as:

- **Low Risk**

### 5. Step 3 – Design and Implement a Risk Management Strategy

Where potential risks are identified, Alpha Plus applies the following measures:

- Engagement with suppliers for clarification and improvement
- Development of Corrective Action Plans (CAPs) where applicable
- Escalation of significant risks to senior management
- Suspension or termination of business relationships in case of severe or unmitigated risks

### 2024-2025 Results

- No supplier relationships required suspension or termination
- No open or unresolved corrective actions
- No material supply chain risks identified

### 6. Step 4 – Independent Third-Party Audit

Alpha Plus ensures monitoring and verification through:

- Internal compliance reviews aligned with RJC COP requirements
- Preparation for independent third-party RJC certification audits

All audit results and verifications are documented and retained as part of due diligence records.

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## 7. Step 5 – Reporting and Transparency

Alpha Plus ensures transparency through:

- This Due Diligence Report
- Integration of due diligence outcomes into the Annual Responsible Business Conduct Report
- Internal management reviews and documented decisions

Material due diligence findings are communicated to relevant stakeholders where appropriate.

## 8. OECD Annex III Compliance Statement (Enhanced)

Alpha Plus fully adheres to the OECD Annex II Model Supply Chain Policy and maintains a strict zero-tolerance approach to:

- Torture, cruel, inhuman, or degrading treatment
- Forced or compulsory labour
- The worst forms of child labour
- Gross human rights violations
- War crimes, crimes against humanity, or genocide

The company also prohibits:

- Direct or indirect support to non-state armed groups
- Illegal control of mining, transportation, or trade routes
- Bribery, corruption, and fraudulent misrepresentation of origin
- Money laundering and non-compliance with AML regulations
- Non-payment of legally required taxes, fees, and royalties

### 2024-2025 Annex II Monitoring Data

- 0 cases of armed group involvement
- 0 severe human rights violations identified
- 0 corruption or bribery incidents
- 0 confirmed Annex II breaches

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## 9. Grievance Mechanism And Remediation

Alpha Plus maintains accessible grievance channels for reporting due diligence concerns:

- **Email:** [compliance@alphaplus.com.tr](mailto:compliance@alphaplus.com.tr)
- **Web:** <https://www.alphaplus.com.tr/ihbarhatti.aspx>

### 2024-2025 Data

- No verified supply chain-related grievances received
- All submissions reviewed in accordance with internal procedures
- No remediation actions required

## 10. Continuous Improvement

Alpha Plus is committed to continuous improvement through:

- Annual review of risk assessments
- Monitoring updates in RJC, OECD, and LBMA standards
- Ongoing employee training and awareness programs
- Strengthening supplier engagement and compliance processes

## 11. Conclusion

This Due Diligence Report demonstrates that Alpha Plus has effectively implemented a **risk-based due diligence system** in line with RJC COP 2024, OECD Due Diligence Guidance, and Annex II requirements.

Through strong management systems, systematic risk assessment, and continuous monitoring, Alpha Plus ensures that its supply chain remains ethical, transparent, and low-risk.

**APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.**

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