

 ALPHA PLUS LIGATIO METALLICA	CODE OF ETHICS POLICY	Doküman No	PLT003
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/3

Scope: Alloy Production, Sales and Export of Precious and Base Metals

1. Purpose and Commitment

Alpha Plus commits to conduct all business activities in accordance with the highest standards of ethics, integrity, transparency and legal compliance.

This Code of Ethics Policy sets out the principles and rules guiding our conduct across all operations, in alignment with national legislation and international standards, including MASAK, OECD, RJC, SMETA, FATF and UN principles.

2. Compliance with Laws and Regulations

Alpha Plus fully complies with all applicable national and international laws and regulations in the countries where it operates. Employees are required to understand and comply with all legal and internal requirements relevant to their roles.

3. Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT)

Alpha Plus maintains robust AML/CFT controls aligned with Turkish AML legislation, MASAK regulations, the FATF 40 Recommendations and international best practices. This includes customer due diligence (KYC), transaction monitoring, suspicious activity reporting and record retention.

4. Anti-Bribery, Anti-Corruption and Facilitation Payments

Bribery, corruption and facilitation payments are strictly prohibited. No employee may offer, give, request or accept any improper benefit. All business must be conducted fairly and transparently.

5. Gifts, Hospitality, Donations and Sponsorships

Gifts or hospitality must be modest, infrequent and consistent with company procedures. Cash or cash-equivalent gifts are prohibited. Donations and sponsorships require prior management approval and due diligence to prevent misuse.

6. Conflict of Interest

Employees must avoid situations where personal interests conflict with company interests. Any potential conflict must be declared immediately and managed transparently.

7. Fair Competition and Antitrust

Alpha Plus supports fair competition and strictly prohibits price-fixing, market sharing, collusion or the exchange of sensitive information with competitors.

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8. Responsible Sourcing of Gold, Silver and Platinum Group Metals

Precious metals are sourced responsibly from approved suppliers in alignment with human rights, environmental and ethical standards.

9. Supply Chain Management

Suppliers and contractors must comply with Alpha Plus ethical standards. Where necessary, risk-based assessments, audits and corrective action plans are applied.

10. Employment Practices

Alpha Plus advocates fair employment, non-discrimination, freedom of association, fair wages and respectful workplace practices.

11. Child Labour and Young Workers

Child labour is strictly prohibited. Young workers are employed only in compliance with laws, education requirements and company policy.

12. Forced Labour and Human Rights

Forced, bonded or involuntary labour is prohibited. Human rights are respected across all operations and supply chains.

13. Occupational Health and Safety

Alpha Plus provides a safe and healthy workplace by complying with OHS laws and best practices.

14. Environmental Protection

The company commits to environmental management, pollution prevention, responsible resource use and compliance with environmental regulations.

15. Data Protection and Confidentiality

Personal data, customer information, trade secrets and business data are protected in accordance with data protection laws and internal security policies.

16. Sanctions, Export Controls and Restricted Parties

Alpha Plus complies with applicable sanctions, embargoes and export control regulations and screens business partners accordingly.

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17. Whistleblowing and Non-Retaliation

Stakeholders may report concerns confidentially via compliance@alphaplus.com.tr or <https://www.alphaplus.com.tr/iletisim.aspx>. Anonymous reporting is permitted. Retaliation against whistleblowers is strictly prohibited.

18. Training and Awareness

Regular training is provided to employees and relevant suppliers to raise awareness and ensure compliance with these rules.

19. Monitoring, Audits and Corrective Actions

Compliance is monitored through internal controls, audits and corrective action plans.

20. Disciplinary Measures

Violations may result in disciplinary action, including termination of employment and/or business relationships.

21. Continuous Improvement

Alpha Plus continuously improves ethical practices based on risk assessments, audits and stakeholder feedback.

22. Policy Review

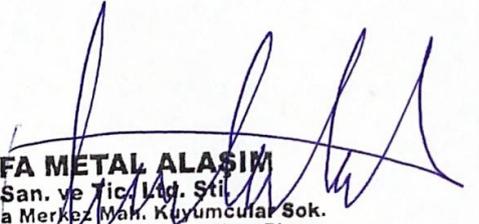
This Code of Ethics is reviewed annually or when significant legal or operational changes occur.

Commitment

Alpha Plus reaffirms its commitment to ethical conduct, responsible sourcing and sustainable business practices.

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.

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


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