

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>OECD DUE DILIGENCE POLICY</b>	Doküman No	PLT008
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/5

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

## 1. Policy Statement

Alpha Plus commits to conduct all commercial activities throughout its product supply chain with integrity, transparency, respect for human rights, environmental responsibility and responsible sourcing principles.

Alpha Plus has adopted this policy in full alignment with:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance)
- OECD Annex II – Model Supply Chain Policy
- Responsible Jewellery Council (RJC) Code of Practices (COP) 2024
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Core Conventions

This policy sets out Alpha Plus's commitments to identify, prevent, mitigate and account for risks related to human rights, conflict financing, corruption and unethical business conduct.

## 2. Purpose and Scope

This policy defines the framework for responsible sourcing and due diligence related to:

- Precious metals (silver) and base metals (copper, zinc, nickel)
- All production, trading, sales and export activities
- Employees, management, suppliers, logistics providers and business partners
- Upstream and downstream supply chain actors

The policy applies to all sourcing locations, including conflict-affected and high-risk areas (CAHRAs).

## 3. Alignment with OECD Due Diligence – Five-Step Framework

As required under RJC COP 6, Alpha Plus applies the OECD Five-Step Due Diligence Framework.

### Step 1 – Establish Strong Company Management Systems

Alpha Plus has established internal management systems to support responsible sourcing, including:

- This OECD-aligned policy approved by top management
- Clear assignment of responsibilities
- Supplier contracts including responsible sourcing and Annex II commitments
- Record-keeping systems for traceability, sourcing and risk assessments

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>OECD DUE DILIGENCE POLICY</b>	Doküman No	PLT008
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	2/5

## **Step 2 – Identify and Assess Risks in the Supply Chain**

Alpha Plus conducts risk-based due diligence to identify actual and potential risks, including:

- Sourcing from CAHRAs
- Human rights abuses
- Forced labour or child labour
- Interference by armed groups
- Corruption, bribery, money laundering and tax evasion

Risk assessments are conducted through:

- Supplier self-assessments
- Document reviews
- Country and supplier risk analysis
- On-site or third-party audits when necessary

## **Step 3 – Design and Implement a Strategy to Respond to Identified Risks**

Where risks are identified, AlphaPlus:

- Develops Corrective Action Plans (CAPs)
- Engages suppliers to mitigate and address risks
- Monitors progress against defined timelines
- Suspends or terminates relationships in cases of severe or unmitigable risks

## **Step 4 – Carry Out Independent Third-Party Audits**

Alpha Plus supports and facilitates:

- Internal reviews
- Independent third-party audits when required
- Verification of supplier compliance with this policy

Audit results are documented and retained as evidence.

## **Step 5 – Public Reporting and Transparency**

Alpha Plus commits to transparency by:

- Keeping records of due diligence activities
- Communicating responsible sourcing efforts internally and externally
- Reporting through sustainability, compliance or annual reports

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>OECD DUE DILIGENCE POLICY</b>	Doküman No	PLT008
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	3/5

#### **4. OECD Annex II Commitment – Zero-Tolerance Areas**

Alpha Plus adopts a strict zero-tolerance approach and will not be involved in, nor tolerate, the following practices at any stage of the supply chain:

##### **4.1 Severe Human Rights Abuses**

Including but not limited to:

- Forced, bonded or compulsory labour
- Child labour
- Human trafficking and modern slavery
- Torture, cruel, inhuman or degrading treatment
- Sexual violence
- War crimes, crimes against humanity, genocide

##### **4.2 Financing of Armed Groups**

Alpha Plus will not source, process or trade materials that:

- Directly or indirectly finance illegal armed groups
- Originate from areas controlled by armed groups

##### **4.3 Security Practices**

Alpha Plus ensures that any public or private security arrangements provide:

- Respect for human rights
- Proportionality and transparency
- Compliance with applicable laws

##### **4.4 Bribery, Corruption and Financial Crimes**

Alpha Plus strictly prohibits:

- Bribery and corruption
- Money laundering
- Tax evasion
- Improper payments or facilitation fees

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>OECD DUE DILIGENCE POLICY</b>	Doküman No	PLT008
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	4/5

## 5. Chain of Custody and Traceability

Alpha Plus implements systems to ensure:

- Traceability from source to final product
- Segregation and identification of materials
- Origin and processing documentation

## 6. Training and Capacity Building

Alpha Plus provides:

- Regular training for employees on responsible sourcing and due diligence
- Communication of policy requirements to suppliers and partners
- Awareness programs on CAHRA risks and ethical sourcing

Training records are retained.

## 7. Grievance Mechanism and Whistleblower Protection

Alpha Plus maintains an accessible and confidential grievance mechanism for employees and external stakeholders.

- Anonymous reporting is permitted
- Retaliation is strictly prohibited
- All reports are investigated impartially
- Corrective and remedial actions are implemented where necessary

## 8. Non-Compliance and Sanctions

Violation of this policy may result in:

- Corrective actions
- Suspension or termination of supplier relationships
- Disciplinary actions
- Legal proceedings where appropriate

## 9. Continuous Improvement and Policy Review

This policy is reviewed at least annually and updated to reflect:

- Changes in OECD or RJC standards
- Regulatory developments
- Operational or supply chain changes

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>OECD DUE DILIGENCE POLICY</b>	Doküman No	PLT008
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	5/5

## 10. Conclusion

This policy demonstrates AlphaPlus's commitment to responsible sourcing, ethical business conduct and full alignment with the OECD Due Diligence Guidance and the RJC Code of Practices 2024. Alpha Plus will continue to uphold the highest international standards across its operations and supply chain.

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

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



**ALFA METAL ALAŞIM**  
San. ve Tic. Ltd. Şti.  
Yenibosna Merkez Mah. Kuyumcular Sok.  
No:4 İstanbul Vizyon Park Merkez Plaza  
C1 Blok Kat:4/0420 Bahçelievler/İST.  
Yenibosna V.D. 051 021 4942  
Ticaret Sicil No: 619857

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.