

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>WHISTLEBLOWING AND GRIEVANCE MECHANISM POLICY</b>	Doküman No	PLT012
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/4

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

## 1. Policy Statement

Alpha Plus commits to the highest standards of ethical conduct, transparency and accountability across all operations and business relationships. In alignment with the Responsible Jewellery Council (RJC) Code of Practices 2024, Alpha Plus has established a safe, accessible and effective whistleblowing and grievance mechanism to enable the reporting of concerns related to unethical conduct, legal non-compliance or breaches of company policies.

Alpha Plus ensures that all reports are handled confidentially, impartially and without retaliation, and that appropriate corrective and remedial actions are taken where necessary.

## 2. Purpose and Applicability

The purpose of this policy is to:

- Enable concerns to be reported safely, confidentially and anonymously
- Protect whistleblowers against retaliation or discrimination
- Ensure reported matters are investigated fairly, promptly and impartially
- Support compliance with legal requirements and RJC COP 2024

This policy applies to:

- All employees, managers and senior executives
- Suppliers, contractors, subcontractors and service providers
- Customers, business partners and other stakeholders
- Any individual affected by or observing Alpha Plus operations or supply chain activities

## 3. Reportable Concerns

Concerns reportable under this policy include, but are not limited to:

- Bribery, corruption, fraud or financial misconduct
- Violations of company policies, procedures or codes of conduct
- Non-compliance with laws or regulatory requirements
- Occupational health and safety violations
- Environmental protection violations
- Human rights or labour rights violations (including forced labour or child labour)
- Discrimination, harassment or retaliation
- Confidentiality and personal data protection breaches
- Supply chain integrity or responsible sourcing concerns

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		Sayfa No	2/4

#### 4. Reporting Channels

Alpha Plus provides multiple secure and accessible channels for reporting:

- E-mail: [compliance@alphaplus.com.tr](mailto:compliance@alphaplus.com.tr)
- Web Hotline: <https://www.alphaplus.com.tr/iletisim.aspx>

Reports may be submitted anonymously or with identification. All reports are recorded and handled in line with confidentiality and data protection requirements.

#### 5. Investigation and Handling Process

All reports are subject to a structured and fair process:

- Initial Assessment: Review of the report to determine scope and seriousness
- Investigation: Impartial and confidential investigation by authorized personnel
- Corrective Actions: Implementation of corrective and preventive measures
- Remediation: Where harm is identified, appropriate remedial actions are taken
- Documentation: Findings and actions are documented and retained

Investigations are conducted promptly, objectively and without conflicts of interest.

#### 6. Confidentiality and Data Protection

Alpha Plus ensures that:

- The identity of whistleblowers is protected to the greatest extent possible
- Information is disclosed strictly on a need-to-know basis
- All data is processed in accordance with applicable data protection laws

#### 7. Protection Against Retaliation

Alpha Plus strictly prohibits any retaliation, discrimination, harassment or disadvantage against individuals who report concerns in good faith. Any retaliation constitutes a serious breach and may result in disciplinary action up to and including termination of employment or business relationships.

#### 8. Roles and Responsibilities

- Top Management: Responsible for ensuring the effectiveness of this policy
- Compliance Function: Oversees reporting, investigations and corrective actions
- Employees and Stakeholders: Encouraged to raise concerns responsibly

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		Sayfa No	3/4

## 9. Training and Awareness

Alpha Plus provides:

- Regular training for employees on ethical conduct and whistleblower protection
- Awareness programs promoting use of reporting channels
- Communication of this policy to suppliers and business partners

## 10. Continuous Improvement

Alpha Plus commits to:

- Periodic review of the whistleblowing mechanism
- Incorporating lessons learned from reported cases
- Maintaining alignment with evolving legal requirements and RJC standards

## 11. Policy Review and Updates

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

- Changes in laws or regulations
- Updates to RJC COP standards
- Organizational or operational changes

## 12. Conclusion

This Whistleblowing and Grievance Mechanism Policy reflects Alpha Plus's commitment to ethical integrity, transparency and responsible business conduct. By providing safe reporting channels and ensuring effective investigation and remedy, Alpha Plus supports compliance with RJC COP 2024 and promotes a culture of trust and accountability across its operations and supply chain.

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

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