

 ALPHA PLUS LIGATIO METALLICA	SUPPLY CHAIN COMPLIANCE POLICY	Doküman No	PLT013
		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. Purpose and Scope

The purpose of this Supply Chain Compliance Policy (“Policy”) is to define Alpha Plus’s expectations regarding ethical, social, environmental and governance standards across its supply chain and to guide the selection, onboarding, monitoring and management of business partners.

This policy forms an integral part of the Alpha Plus Code of Ethics and applies to:

- All Alpha Plus employees, directors and officers
- All business partners, including suppliers, distributors, contractors, service providers, agents and consultants
- All procurement, production, sales and export activities

Each Alpha Plus business unit is responsible for ensuring that business partners are informed of, understand and comply with this policy.

2. Definitions

- Business Partners: Suppliers, distributors, authorized service providers, representatives, independent contractors and consultants.
- Human Rights: Rights inherent to all individuals, as recognized by the UDHR, ILO Core Conventions and the UN Guiding Principles on Business and Human Rights.
- ILO: International Labour Organization.
- Money Laundering: Concealment or conversion of proceeds derived from criminal activities.
- Sanctions Target: Any individual, entity or jurisdiction subject to international sanctions or embargoes.
- UN Global Compact: A United Nations initiative promoting responsible business practices.

3. General Principles

Alpha Plus applies a risk-based approach to supply chain management and selects business partners based on:

- Technical capability and product/service quality
- Financial soundness and corporate reputation
- Compliance with ethical, social and environmental standards

To manage supply chain risks, AlphaPlus implements:

- Third-Party Screening: To ensure business partners and beneficial owners are not sanctions targets
- Contractual Commitments: Commitment to comply with this policy and the Alpha Plus Code of Ethics
- Monitoring and Audits: Desktop or on-site assessments where necessary
- Training and Awareness: To communicate expectations

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		Revizyon No	
		Sayfa No	2/4

4. Business Partner Onboarding and Due Diligence

Before establishing a business relationship, Alpha Plus conducts due diligence proportionate to the business partner's risk profile, which may include:

- Prohibited party / sanctions screening
- Know Your Customer (KYC) and Anti-Money Laundering (AML) controls
- Completion of self-assessment questionnaires
- Review of legal, ethical, labour, environmental and reputational risks
- Alignment with OECD Due Diligence Annex II requirements and procedures

Where red flags (risk indicators) are identified, Enhanced Due Diligence (EDD) may be carried out. Senior management approval is required before proceeding.

Alpha Plus reserves the right to:

- Include audit and compliance clauses in contracts
- Suspend or terminate relationships in cases of non-compliance

5. Guiding Principles for Business Partners

Business partners are expected to comply with the following principles:

5.1 Compliance with Laws and Regulations

Business partners must comply with all applicable laws, including those related to:

- Competition
- Anti-bribery and anti-corruption
- Anti-money laundering and counter-terrorist financing
- Data protection and confidentiality

5.2 Human Rights – Zero Tolerance

Business partners must respect internationally recognized human rights and apply zero tolerance for:

- Child labour
- Forced, bonded or compulsory labour
- Human trafficking and modern slavery

5.3 Labour Rights and Working Conditions

Business partners must:

- Comply with labour laws and ILO standards
- Provide fair wages and legal working hours
- Respect freedom of association and collective bargaining
- Prohibit discrimination and harassment

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		Revizyon No	
		Sayfa No	3/4

5.4 Occupational Health and Safety

Business partners must provide a safe and healthy workplace by:

- Identifying and managing occupational risks
- Providing training and protective equipment
- Complying with applicable health and safety regulations

5.5 Environmental Responsibility

Business partners are expected to:

- Comply with environmental laws and permits
- Minimize environmental impacts
- Manage waste, emissions and chemicals responsibly
- Continuously improve environmental performance

5.6 Ethics and Integrity

Business partners must conduct business with integrity and fairness, including:

- Zero tolerance for bribery, corruption and fraud
- Accurate recordkeeping
- Ethical and transparent business practices

5.7 Reporting and Grievance Mechanisms

Business partners must:

- Maintain effective channels for reporting concerns
- Protect whistleblowers against retaliation
- Cooperate with investigations and corrective actions

6. Training and Capacity Building

Alpha Plus encourages business partners to:

- Provide training to employees on ethics, labour rights and safety
- Participate in capacity-building initiatives to improve compliance

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		Revizyon No	
		Sayfa No	4/4

7. Management Systems

Business partners are expected to maintain management systems appropriate to their size and risk profile to ensure:

- Legal and policy compliance
- Risk identification and mitigation
- Continuous improvement

8. Monitoring, Corrective Actions and Sanctions

Alpha Plus may monitor compliance through assessments, audits or reviews. Where non-compliance is identified:

- Corrective action plans may be required
- Timelines and follow-up will be defined
- Severe or repeated violations may lead to contract termination

9. Roles and Responsibilities

- Alpha Plus Employees and Directors: Responsible for implementing this policy
- Business Partners: Responsible for compliance and cooperation
- Management: Oversees implementation and continuous improvement

10. Conclusion

This Supply Chain Compliance Policy (2024) reflects Alpha Plus's commitment to ethical conduct, responsible sourcing and sustainable business practices in alignment with RJC COP 2024. Through effective due diligence, collaboration and continuous improvement, Alpha Plus aims to strengthen supply chain integrity and contribute positively to the global jewellery industry.

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.

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