

 <b>ALPHA PLUS</b> LIGATIO METALLICA	<b>SUSTAINABLE SOURCING POLICY</b>	Doküman No	PLT014
		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 is aware of risks related to the extraction, trade, processing, transport and export of precious metals, particularly those originating from Conflict-Affected and High-Risk Areas (CAHRAs). In line with its commitment to human rights, ethical business conduct and responsible sourcing, Alpha Plus adopts this Sustainable Sourcing Policy to ensure that its sourcing activities do not contribute to conflict, human rights abuses or other serious violations.

As a member of the Responsible Jewellery Council (RJC), Alpha Plus commits to full compliance with RJC COP 2024, the OECD Due Diligence Guidance and the OECD Annex II Model Supply Chain Policy. This policy is communicated to suppliers and business partners to guide compliance and promote responsible practices throughout the supply chain.

Alpha Plus complies with all applicable United Nations sanctions, international regulations and national laws implementing such measures.

## 2. Purpose and Applicability

The purpose of this policy is to:

- Define Alpha Plus's sustainable and responsible sourcing principles
- Identify, prevent and mitigate risks related to precious metal sourcing
- Ensure sourcing activities respect human rights and avoid conflict financing
- Establish clear expectations for suppliers, contractors and business partners

This policy applies to:

- Sourcing activities for precious and base metals
- All employees, management, agents and consultants involved in sourcing processes
- All suppliers, traders and other business partners

## 3. Commitment as an RJC Member

Through independent external audits and internal management systems, Alpha Plus demonstrates that it:

- Respects human rights in accordance with the UDHR and the ILO Declaration on Fundamental Principles and Rights at Work
- Is not involved in or tolerant of corruption, bribery, money laundering or terrorist financing
- Supports transparency in payments and transactions
- Does not directly or indirectly support armed groups
- Maintains an effective grievance and whistleblowing mechanism
- Applies risk-based due diligence for responsible sourcing from CAHRAs

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#### 4. Sourcing Principles

Alpha Plus commits to the following principles in all sourcing activities:

##### 4.1 Zero Tolerance for Serious Abuses

Alpha Plus applies zero tolerance for the following practices:

- Torture or cruel, inhuman or degrading treatment
- Forced, bonded or compulsory labour
- Child labour
- Human trafficking and modern slavery
- War crimes, violations of international humanitarian law or human rights law
- Crimes against humanity or genocide

##### 4.2 Avoidance of High-Risk Business Relationships

Alpha Plus avoids entering sourcing or commercial relationships where there is a reasonable risk of involvement in human rights abuses, conflict financing or other serious violations. Where risks are identified, Alpha Plus applies enhanced due diligence or avoids sourcing.

##### 4.3 No Support to Armed Groups

Alpha Plus does not tolerate direct or indirect support to non-state armed groups, particularly by sourcing from entities that:

- Control mine sites, transport routes or trading points
- Illegally tax or extort money or precious metals
- Illegally tax or extort intermediaries, exporters or traders

##### 4.4 Termination of Relationships with Non-Compliant Suppliers

Alpha Plus immediately suspends or terminates business relationships if it identifies a reasonable risk that a supplier:

- Is directly or indirectly linked to armed groups
- Is involved in serious human rights abuses
- Cooperate with due diligence or remediation efforts

##### 4.5 No Support to Abusive Security Forces

Alpha Plus commits not to provide direct or indirect support to public or private security forces that:

- Control mine sites or transport routes or illegally tax
- Engage in extortion or human rights abuses

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#### 4.6 Appropriate Role of Security Forces

Where security forces are engaged, their role must be limited to:

- Protecting employees, facilities, equipment and goods
- Acting in accordance with the rule of law and internationally recognized human rights standards

#### 4.7 Prohibition of Bribery and Misrepresentation

Alpha Plus strictly prohibits:

- Offering, promising, giving or requesting bribes
- Misrepresenting or concealing the origin of precious metals
- False declarations related to taxes, duties, tariffs or royalties

#### 4.8 Zero Tolerance for Money Laundering

Alpha Plus prohibits any money laundering activities related to the extraction, trade, transport, processing or export of precious metals and supports international efforts to combat financial crime.

### 5. Due Diligence and Risk Management

Alpha Plus implements a risk-based due diligence system aligned with:

- OECD Due Diligence Guidance (Five-Step Framework)
- RJC COP 6

This includes:

- Supplier screening and risk assessment
- Enhanced due diligence where necessary
- Corrective action plans and remediation
- Ongoing monitoring and review

### 6. Training and Awareness

Alpha Plus ensures:

- Regular training for employees involved in sourcing processes
- Suppliers are informed about this policy and related expectations
- Ongoing awareness of CAHRA and Annex II risks

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## 7. Enforcement and Accountability

All employees, agents, consultants and business partners must comply with this policy. Violations may result in:

- Disciplinary actions
- Suspension or termination of contracts
- Legal action where appropriate

Top management is responsible for oversight and enforcement.

## 8. Policy Review and Continuous Improvement

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

- Changes to RJC COP standards
- Updates to OECD guidance
- Regulatory developments
- Lessons learned from due diligence activities

## 9. Conclusion

This Sustainable Sourcing Policy reflects Alpha Plus's commitment to ethical sourcing, protection of human rights and responsible supply chain management. Through robust due diligence, zero tolerance for abuses and continuous improvement, Alpha Plus aims to ensure that its sourcing practices fully align with RJC COP 2024 and international best practices.

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

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