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Modern Slavery and Human Trafficking Statement

Version

1.2

Controller

Hülya CİVELEK

Approved by

Sarp TARHANACI

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March 2025

Next Review

March 2026

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Modern Slavery and Human Trafficking Statement 2025

SECTION 1: Organisational Structure, Business and Supply Chains

Aleks Metal Rafineri A.Ş. is a registered company operating in Türkiye, engaged in refining precious metals, producing manufacturing inputs, and conducting global sales and exports. The company serves a wide international client base in compliance with national and international regulations.

Aleks Metal Rafineri is fully committed to compliance with global human rights standards, including the Turkey Modern Slavery Act signed with EU (2009). We do not tolerate slavery, servitude, forced or compulsory labour, or human trafficking within any part of our business or supply chains.

We have not identified any instances of modern slavery or human trafficking in our business operations or among our suppliers during the reporting period.

The company is committed to conducting business with integrity, fairness, and respect for human dignity. We maintain robust systems and controls to ensure:

- Zero tolerance for fraud, corruption, or criminal conduct,
- Adherence to high moral and ethical standards,
- Sound and transparent business relationships with all stakeholders.

SECTION 2: Policies relating to Modern Slavery and Human Trafficking

Aleks Metal Rafineri maintains and enforces effective internal policies and external supplier requirements in alignment with the following standards and frameworks:

- LBMA Responsible Gold Guidance (version 9) – 2022
- LBMA Responsible Silver Guidance – 2023
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas – 2016
- UK Bribery Act – 2010
- OECD Anti-Bribery Convention – 1997, 2009, 2021
- ILO Conventions: Minimum Age (1973), Worst Forms of Child Labour (1999)
- Extractive Industries Transparency Initiative (EITI) Principles – 2003, updated 2023
- Responsible Jewellery Council Code of Practices – 2019

Complementary policies such as Anti-Money Laundering, Know Your Customer (KYC), and Anti-Corruption contribute to a comprehensive compliance structure.

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SECTION 3: Due diligence processes in relation to slavery and human trafficking

Aleks Metal Rafineri conducts rigorous due diligence on all customers, suppliers, and trading partners. This includes risk assessments for AML, geographic risk, and adherence to responsible sourcing protocols.

All suppliers are screened against the latest Conflict-Affected and High-Risk Areas (CAHRAs) list per Regulation (EU) 2017/821. Supply Chain Due Diligence procedures are documented, annually updated, and subject to third-party audits.

SECTION 4: Specific Risks of Modern Slavery within the Precious Metals Industry

We recognize that the global precious metals supply chain may carry heightened risks of forced labour and human trafficking. Aleks Metal Rafineri trains relevant staff and conducts analysis using the following sources:

- ILO Baseline Survey on Informal Mining (2006)
- Ending child labour, forced labour, and trafficking in supply chains (2019)
- Gap Analysis on Child Labour in ASM Gold Mining (2019)
- Measuring Forced Labour and Human Trafficking in Global Supply Chains (2019)
- ILO Baseline on Small-scale Gold Mining in the Philippines (2020)

Suppliers must comply with international laws and our standards, especially in high-risk jurisdictions. Additional scrutiny is applied where warranted.

SECTION 5: Effectiveness in monitoring Modern Slavery Prevalence

Aleks Metal Rafineri has strong internal controls, policies, and audits to prevent fraud, bribery, and slavery-related violations.

We support this with training programs tailored for high-risk and procurement-related staff, emphasizing red flags of modern slavery, and encouraging early intervention and internal reporting.

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SECTION 6: Training

Employees are trained on ILO standards and the Ethical Trading Initiative's indicators of forced labour. Aleks Metal Rafineri also provides guidance on identifying and responding to modern slavery risks.

All employees are encouraged to use the company's Whistleblowing Mechanism to report concerns confidentially. We also distribute official Türkiye Home Office guidance and display the Modern Slavery Helpline:

REPORTS CAN BE SUBMITTED ANONYMOUSLY VIA:

Email: ethics@aleksmetal.com

Phone & SMS & Whatsapp: +90 850 840 1237

Hotline: <https://aleksmetal.com/en/hotline>

Address:

Aleks Metal Rafineri (AMR)

AMR , İkitelli OSB mah. Marmara P Blok Sk P Blok No 11 Küçükçekmece / İstanbul – Turkey.

APPROVAL FOR THIS STATEMENT

This statement was approved by the Board of Directors of Aleks Metal Rafineri A.Ş. on 15 March 2025.

It will be reviewed and updated annually or earlier if significant changes occur in the regulatory landscape or our operations.

These procedures will be reviewed on an annual basis.