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ENVIRONMENTAL POLICY

Version

1.2

Controller

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Approved by

Sarp TARHANACI

Date

March 2025

Next Review

March 2026

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ENVIRONMENTAL POLICY

1. Purpose

Aleks Metal Rafineri A.Ş. ("Aleks") is committed to minimizing the environmental impacts of its operations and promoting sustainable practices throughout its business activities. This Environmental Policy is designed in accordance with the ISO 14001:2015 Environmental Management Systems Standard and reflects Aleks's commitment to environmental protection, regulatory compliance, continuous improvement, and sustainable resource management.

2. Scope

This policy applies to all Aleks Metal Refinery facilities, employees, contractors, suppliers, and any party acting on behalf of the company involved in the refining, storage, transport, or trading of precious metals. It includes upstream and downstream activities and covers both direct and indirect environmental impacts.

3. Core Environmental Commitments

Aleks commits to:

- **Compliance with Legal and Other Requirements:** Maintain full compliance with all applicable environmental laws, regulations, permits, and voluntary commitments including ISO 14001, LBMA Responsible Gold & Silver Guidance, and RJC COP.
- **Pollution Prevention:** Prevent pollution by controlling emissions to air, water, and soil, and minimizing noise, odor, and waste generation through source reduction and best available technologies.
- **Sustainable Resource Use:** Optimize the use of raw materials, energy, and water by promoting efficiency and conservation measures across operations.
- **Climate Action:** Measure, monitor, and reduce greenhouse gas emissions by implementing a carbon reduction strategy aligned with ISO 14064 and ISO 50001.
- **Waste Management:** Implement a comprehensive waste management hierarchy (reduce, reuse, recycle, recover, dispose) and handle hazardous and non-hazardous waste in an environmentally sound manner.
- **Environmental Risk Management:** Identify, assess, and mitigate environmental risks through regular audits, incident investigations, and implementation of preventive and corrective actions.
- **Biodiversity and Ecosystem Protection:** Ensure that activities avoid damage to natural habitats and biodiversity, particularly in areas of ecological sensitivity.
- **Lifecycle Thinking:** Integrate environmental considerations into the design, development, and procurement of products and services.
- **Emergency Preparedness:** Maintain environmental emergency preparedness and response plans to deal effectively with potential environmental incidents.

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4. Responsibilities and Implementation

- Senior management is responsible for ensuring the policy is communicated, implemented, and reviewed annually.
- Department heads are accountable for incorporating environmental objectives into their operational plans.
- Employees are responsible for complying with environmental procedures and reporting any issues or opportunities for improvement.
- The Environment & Sustainability Committee monitors performance and reports to the Board of Directors.

5. Supplier and Partner Expectations

All suppliers and business partners must:

- Adhere to Aleks's Environmental Policy.
- Maintain applicable environmental permits.
- Demonstrate commitment to reducing environmental impacts through certified systems (e.g., ISO 14001, RJC COP, LBMA).
- Undergo periodic environmental assessments and cooperate with Aleks in implementing sustainability initiatives.

6. Continuous Improvement

Aleks is committed to:

- Setting measurable environmental objectives and targets.
- Monitoring environmental key performance indicators (KPIs).
- Conducting regular internal and external audits.
- Incorporating stakeholder feedback into its Environmental Management System (EMS).

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7. Environmental Targets and Objectives (2025–2030)

Aleks Metal Refinery has established the following environmental targets:

- 1. Reduce Greenhouse Gas Emissions:** Achieve a 25% reduction in Scope 1 and Scope 2 carbon emissions by 2030 (baseline: 2024), aligned with ISO 14064.
- 2. Energy Efficiency:** Improve energy efficiency by 15% across all production processes by 2030, tracked via ISO 50001 metrics.
- 3. Water Conservation:** Reduce water usage per unit of production by 20% by 2030.
- 4. Waste Diversion:** Divert at least 85% of total waste from landfill through reuse, recycling, or recovery by 2030.
- 5. Supplier Compliance:** Ensure that 100% of key suppliers meet Aleks’s environmental requirements and have ISO 14001 certification or equivalent by 2028.

These targets will be monitored annually, reviewed during management reviews, and publicly reported as part of Aleks’s Sustainability Report.

8. Communication and Awareness

- This policy is made available to the public and all interested parties.
- Environmental training and awareness programs are conducted regularly for all staff.
- Aleks maintains open communication channels for stakeholder concerns and suggestions.

Approved by: Quality Management Team Aleks Metal Refinery A.Ş. **Date:** 01 March 2025

1. MEETING PROCEDURES

All findings, suggestions and decisions must be noted in a Risk Committee Meeting Minutes book.

All decisions can be taken by 2/3 majority vote as long the committee is operational and staffed according to this policy.

Members votes, comments and objections must be noted in the Minutes.

Meetings can be held online or at company premises as needed, but the decisions must be noted in the Minutes.

2. OTHER ISSUES

This procedure is prepared, modified and put into circulation by the Board of Directors of Aleks Metal.

All ammendments and/or discontinuation of these policies can only take place by the written consent of the Board of Directors of Aleks.

These procedures will be reviewed on an annual basis.