

Occupational Health and Safety Policy

Document No	UYM.PO.08.E
Release Date	01.08.2023
Revision No	01
Revision Date	03.03.2025
Information Class	General Access

OCCUPATIONAL HEALTH AND SAFETY POLICY

Version

1.2

Controller

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Approved by

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Date

March 2025

Next Review

March 2026

Version 1.1 1/3



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1. Commitment to Health and Safety

Aleks Metal Refinery A.Ş. is fully committed to providing a safe and healthy working environment for all employees, contractors, visitors, and other stakeholders involved in our operations. We view occupational health and safety (OHS) as an essential component of our business strategy and organizational integrity.

We pledge to:

- Eliminate hazards and reduce occupational health and safety risks.
- Comply with all applicable legal, regulatory, and ISO 45001:2018 requirements.
- Provide necessary resources, training, and support to promote a safe workplace culture.
- Foster active consultation and participation of workers and their representatives.

2. Policy Scope

This policy applies to:

- All Aleks Metal Refinery facilities and project sites;
- All employees, contractors, and third parties operating under Aleks's responsibility;
- All operations including refining, transportation, maintenance, procurement, administration, and logistics.

3. Objectives

Our OHS goals are to:

- Prevent work-related injuries and illnesses.
- Ensure zero fatalities and serious workplace accidents.
- Continuously improve our OHS management system.
- Engage all levels of the organization in proactive health and safety culture.

4. Key Principles and Actions

Aleks commits to:

- Hazard Identification & Risk Control: Identify, evaluate, and mitigate workplace hazards systematically.
- Legal & Regulatory Compliance: Fulfill and exceed all national laws and international standards relating to OHS.
- **Emergency Preparedness**: Maintain response procedures for fire, chemical spills, medical emergencies, and natural disasters.
- Occupational Health Monitoring: Conduct periodic health assessments and exposure monitoring for employees.
- Training & Awareness: Provide regular training on safety procedures, PPE use, and safe work practices.



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- Contractor Safety: Require all contractors to adhere to Aleks's OHS policies and undergo induction and safety briefings.
- Worker Participation: Involve employees and safety committees in decisions affecting workplace health and safety.

5. Five-Year OHS Targets (2025–2030)

Target	Measure	Deadline
Zero fatalities or major injuries	100% incident-free workplace	Ongoing
Lost Time Injury Frequency Rate (LTIFR) reduction	50% decrease	By end of 2027
Full ISO 45001 certification across all operations	Certification scope	By Q4 2025
Safety training completion for all employees	100% workforce trained annually	Yearly
Implementation of digital incident tracking system	Fully operational system	Q2 2026

6. Responsibilities

- Top Management: Ensure strategic leadership and resources for OHSMS.
- OHS Manager: Lead implementation, monitoring, and continuous improvement of the OHSMS.
- Supervisors: Enforce safety rules, ensure risk controls, and report incidents.
- All Employees: Take ownership of safety in their work areas and report unsafe conditions immediately.

7. Monitoring and Review

- OHS performance is reviewed quarterly by the management team.
- Internal audits and inspections are performed regularly.
- Incident investigations and corrective actions are documented and tracked.

8. Communication

- This policy is communicated to all employees and contractors.
- Available publicly and to stakeholders via Aleks's website and internal platforms.
- Feedback from workers is actively encouraged through safety meetings and grievance mechanisms.

Approved by:

Executive Management Team Aleks Metal Refinery A.Ş.

Date: 01 March 2025