

RESPONSIBLE SUPPLY AND PRODUCTION POLICY

EXTENT

This policy covers new suppliers and contractors, who are needed during the Concentrated Copper and Pyrite production of Eti Bakır A.Ş. it also covers the application of OECD Compliance Guide Annex-I and Annex-II conditions at Eti Bakır A.Ş.

Introduction

Eti Bakır A.Ş is a leader in its sector in terms of bringing natural resources into the economy and ensuring sustainability. Eti Bakır A.Ş. requires its suppliers to conduct their business with the highest level of ethics; It expects and constantly demands that they respect labor and human rights, as well as being sensitive to the environment. Eti Bakır A.S. Responsible Supply Policy; **OECD Compliance Guide for Responsible Supply Chain for Mines of Conflict-Affected and High-Risk Regions**. It has created in accordance with the Supply Chain Policy Model included in Annex-II

Products and Processes

Eti Bakır A.S. Küre Plant is located within the borders of Küre town of Kastamonu. Copper and pyrite concentrate production activities are carried out from run of mine.

The run of mine operation is carried out by underground production methods in Eti Bakır A.Ş Küre Plant. Production panels are opened in the form of ore tracking in the direction of ore width from the guide gallery advancing parallel to the ore in production-oriented studies. Ore is produced by drilling and blasting method in these galleries.

The concentrator facility is the unit where the enrichment processes of the run of mine coming from the underground

In the enrichment unit, the material is subjected to crushing, grinding, flotation and filtering processes to produce concentrated copper and concentrated pyrite.

Undertaking

As Eti Bakır A.Ş,

- We will carefully evaluate the compliance of our suppliers and our Company with the OECD compliance guide, National and International Legal and Company Ethical Policies,
- We will confirm that our Suppliers and Contractors do not procure mines and similar materials from conflict zone,
- When we detect that our suppliers and contractors are in violation of the OECD compliance guide, we will not tolerate, we will immediately suspend and terminate our relations with the supplier,
- We will not obtain profit or benefit from our Suppliers and Contractors who are in violation of the OECD compliance guide,

- We will not tolerate any direct or indirect support to non-state armed groups through mining, transportation, trading, processing or export activities,

We guarantee that we will not procure mines from Conflict Affected and High Risk Areas, and we will support our suppliers and business partners to comply with these decisions as well.

Eti Bakır A.Ş applies a "Zero Tolerance Policy" on unethical business behavior, bribery, corruption and forced labor.

Requirements for Suppliers

Our expectations of our suppliers and business partners as part of managing the risks and exposure of mines extracted from conflict-affected and high-risk areas;

- In the procurement process, absence of all kinds of torture, cruelty and inhuman/degrading treatment;
- Employees are not subject to any form of forced labor against their will, by force or by the threat of punishment.
- Absence of child labor;
- Absence of other human rights violations such as sexual violence;
- Absence of war crimes, other serious violations of international humanitarian law, crimes against humanity and genocide in the procurement process;
- No illegal extortion or tax levying in mining sites or transport routes, or in mineral trade areas;
- No illegal taxation or extortion from intermediaries, export companies or international traders in the procurement process;
- In the event any company makes a contract with public or private security forces in our supply chain, these security forces mustn't act against Security and Human Rights;
- In order to ensure security; transparency, proportionality and accountability made to public security forces in payments;
- Preventing vulnerable groups, especially artisanal miners, from the negative effects of labor-intensive and small-scale enterprises, public or private security forces in their mines in the supply chain;
- Not offering bribes to conceal or falsify the origin of mines and to mislead the public about taxes, fees and concession fees paid to governments in mineral extraction, trading, processing, transport and export activities;
- Elimination of money laundering where there is a risk of money laundering arising from or associated with the extraction, trade, processing, transport or export of mines.

Occupational Health, Safety & Environment

Eti Bakır A.Ş's sustainable commitment includes its commitment to protect the environment and provide healthy and safe workplaces, as well as the efficient use of resources. Eti Bakır A.Ş expects its suppliers to make similar commitments in order to continuously improve their environmental, health and safety performance.

Ensuring Occupational Health and Safety: Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures and personal protective equipment. Suppliers will comply with all health and safety laws applicable to the workplace.

Respect for the Environment: Suppliers shall comply with applicable environmental laws and have systems in place to ensure the safe management of waste, air emissions and wastewater discharges. By using recycled materials, suppliers must continually strive to minimize environmental impact and make continuous improvements in resource efficiency.

Expectations Regarding the Rule of Business Ethics for Suppliers

Eti Bakır A.Ş. expects its suppliers to implement systems and controls that will encourage compliance with applicable national and international laws and principles set forth in this Code, including policies, training, monitoring and inspection mechanisms. While providing goods and services to Eti Bakır A.Ş., the suppliers should apply these or similar principles to the subcontractors and suppliers they work with.

Eti Bakır A.Ş. reserves the right to evaluate and monitor suppliers' compliance with these Rules.

Eti Bakır A.Ş. may request corrective actions from its suppliers who do not comply with these Rules., or these suppliers may not be considered as approved suppliers in future works.

Annex-1: Compliance Guidelines for Responsible Supply Chains for Mines from Conflict-Affected and High-Risk Areas – 3rd Edition

If a situation is detected in the products we supply and/or manufacture, in violation of the Responsible Supply Chain Compliance Guide for Mines of Conflict-Affected and High-Risk Areas, please notify us to the e-mail address specified below or via the form on our website

[E-Posta :mining@cengiz.com.tr](mailto:mining@cengiz.com.tr)

[Web: www.etibakir.com.tr](http://www.etibakir.com.tr)