

Supplier Code of Conduct



**MINING
METALLURGY**

A. Purpose

At OYAK Mining Metallurgy, we believe that acting respectful of society, humans, and environment, and in a manner that is ethical and responsible is key to our long-term success. We acknowledge that we can achieve our goals by working with our business partners and we set out our expectations regarding compliance and anticorruption, labor practices, health and safety, and environmental management through "Supplier Code of Conduct".

B. Scope of Application

All suppliers, vendors, contractors, consultants, agents and other providers of goods and services who are in a business relationship with OYAK Mining Metallurgy Companies are expected to follow the Supplier Code of Conduct.

C. Code of Conduct

1. Compliance with Laws

Suppliers must be aware and in full compliance with all applicable laws and regulations of the countries in which operations are managed or services provided as well as international regulations.

2. Human Rights

Child Labor: Suppliers should avoid any sort of child labor in their business operations. They have to comply with the minimum employment age limit defined by national law or regulation and comply with relevant International Labor Organization (ILO) standards.

Non-discrimination: Suppliers shall provide a workplace free of discrimination. Discrimination for reasons such as color, age, gender, sexual orientation, ethnicity, religion is not tolerated.

Forced Labor: Suppliers should avoid any forced, compulsory, bonded, indentured or involuntary labor of any kind. Employment decisions must be based on free will.

3. Employment Practices

Occupational Health and Safety: Suppliers are obliged to take all necessary measures in terms of occupational health and safety of employees, and in this context, Suppliers are responsible to provide all necessary resources including trainings and protective equipment. Moreover, Suppliers are expected to operate in a manner that actively manages safety risks and prevents occupational accidents and diseases.

Environment: Suppliers shall comply with all applicable environmental laws and regulations. Furthermore, suppliers shall assess the environmental impact of the work to be undertaken or decision to be made. Suppliers are further expected to operate in a manner that conserves natural resources, reduces waste and pollution and to take necessary precautions accordingly.

Respecting Employees: Suppliers shall treat employees with respect.

Harassment: Suppliers must ensure that their employees are afforded an employment environment that is free from physical, psychological and sexual harassment, or other abusive conduct.

Wage and Hours of Work: Suppliers must pay employees at least the minimum wage required by local law. Suppliers must comply with applicable local laws on working hours. Moreover, employees must be paid for overtime hours as is legally required or, in those regions where such laws do not exist, at least equal to their regular hourly payment rate. Furthermore, all employees are entitled to at least one day off in every seven-day period.

Freedom of Association: Suppliers shall respect the rights of their employees, as set forth in local laws, to associate freely, form, and join labor unions.

4. Bribery and Corruption

Suppliers will not offer or accept bribes or other unlawful incentives to/from their business partners. Suppliers must take necessary measures to prevent bribery and corruption. Suppliers must comply with local and international anti-corruption laws, directives and regulations.

5. Conflict of Interest

Suppliers shall avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest. Suppliers shall provide notification to all affected parties in the event that a potential conflict of interest arises.

6. Accurate Records

Suppliers must maintain books and records that reflect all business transactions in an accurate, honest and timely manner. Suppliers must not alter any record entry to conceal or misrepresent the underlying transaction represented by it. Records should be retained based on the applicable retention requirements.

7. Information Security

Suppliers are expected to protect any of OYAK Mining Metallurgy Companies' confidential information to which they have access, including its trade secrets, intellectual property, or financial information.

D. Reporting Breaches the Code

Suppliers shall provide a reporting mechanism for breaches of the Supplier Code of Conduct, which must ensure employees or other stakeholders that reporting a breach would not eventuate a retaliatory action.