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ÖZALTIN HOLDING A.Ş.

SUPPLY CHAIN COMPLIANCE POLICY

1. PURPOSE AND SCOPE

The purpose of this Supply Chain Compliance Policy (“Policy”) is to reflect the sensitivity of Özaltın Holding A.Ş. and its group companies (“Company”) regarding issues such as human rights, safety, the environment, and ethics, and to provide the necessary guidance regarding the standards, methods, and principles we expect our Business Partners to adhere to.

This Policy also aims to serve as a guide in the Company’s processes for selecting and monitoring Business Partners.

All employees and managers of the Company are obligated to act in accordance with this Policy, which is an integral part of the Company’s Ethics and Conduct Principles¹. Furthermore, the Company expects all Business Partners to act in accordance with this Policy to the extent applicable to the relevant party and/or transaction, and takes the necessary steps to ensure this.

2. DEFINITIONS

“UN” refers to the United Nations international organization.

“UN Guiding Principles on Business and Human Rights”² is a guidance document for countries and companies aimed at addressing, preventing, and remedying human rights violations in the business sector.

“UN Global Compact”³ refers to the agreement based on universally accepted UN declarations regarding social responsibility and sustainability practices, addressing the 10 core areas of corporate responsibility in the fields of human rights, labor standards, the environment, and anti-corruption.

“Export Control Regulations” refers to the relevant national legislation that regulates and restricts the import, export, and re-export of technologies, information, products, and services for reasons of trade, foreign policy, and national security.

¹ It refers to the set of rules and values encompassing the fundamental ethical and behavioral principles outlined in Özaltın Holding A.Ş.’s Code of Ethical Conduct.

² https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

³ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

The term **“Government/Public Official”** refers to any person who participates in the conduct of a public activity on a permanent, temporary, or provisional basis, whether through appointment, election, or any other means, including but not limited to the following:

- Individuals employed by any public institution or public economic enterprise within the country or in a foreign country,
- Employees of any political party located within the country or in a foreign country, and all political candidates,
- Individuals holding positions in any legislative, executive, or judicial body within the country or in a foreign country,
- Judges, jurors, or other judicial officials serving in national, international, or foreign state courts,
- Officials or representatives working in national or international parliaments;
- Arbitrators serving in arbitration proceedings initiated to resolve a legal dispute.

“ILO” refers to the International Labour Organization.

“ILO Declaration on Fundamental Principles and Rights at Work” refers to the ILO Declaration stating that all member states, even if they have not ratified the relevant conventions, are obligated to respect, promote, and uphold the following four principles in good faith:⁴

“Human Rights” refer to the rights inherent to all human beings, regardless of gender, race, color, religion, language, age, nationality, differences in opinion, or differences in wealth, and include the right to a life of equality, freedom, and dignity.

The **“Universal Declaration of Human Rights (UDHR)”**⁵ is a landmark document in the history of human rights. Drafted by representatives from all regions of the world with diverse legal and cultural backgrounds, this Declaration was proclaimed by the UN General Assembly in Paris on December 10, 1948, as a common standard of achievement for all peoples and all nations, and is the first document to emphasize the universal protection of fundamental human rights.

“Business Partners” includes suppliers, customers, contractors, and any representatives, subcontractors, consultants, and other third parties with whom the Company has a business relationship, as well as the employees and representatives of the aforementioned parties.

“Politically Exposed Person (PEP)”⁶, refers to high-ranking individuals who, currently or in the past, domestically or in a foreign country, have been entrusted with a significant public office through election or appointment; members of the board of directors, senior executives, and executive assistants of international organizations; other individuals performing equivalent roles; senior politicians; senior officials of political parties; senior judicial, administrative, or

⁴ <https://www.ilo.org/declaration/lang--en/index.htm>

⁵ <https://www.un.org/en/universal-declaration-human-rights/>

⁶ <https://www.fatf-gafi.org/documents/documents/peps-r12-r22.html>

military officials, and senior executives of public economic enterprises, as well as the spouses, first-degree relatives (parents and children), and close associates of all such individuals.

“**Özaltın Holding**” refers to Özaltın Holding A.Ş.

“**Bribery**” refers to the act of providing, offering, or promising, directly or through intermediaries, any material or immaterial benefit to a public official or any third party (or to another person designated by such third party), to perform, refrain from performing, expedite, prioritize, alter, or delay an action required by their official duties, either directly or through intermediaries. The term “material or immaterial benefit” as used in this definition includes, but is not limited to, any form of money, gifts, social benefits, opportunities, commissions, and entertainment.

“**Money Laundering**” refers to the integration of proceeds derived from illegal activities into the financial system as if they were obtained legally; in other words, it is the concealment of the fact that these proceeds were derived from illegal activities.

“**Company**” refers to Özaltın Holding Inc., Özaltın Construction, Trade, and Industry Inc., Özaltın Hotel Operations Inc., Özaltın Greenhouse and Trade Inc., Özaltın Energy Production and Construction Inc., Zenit Mining Industry and Trade Inc., Enova Wholesale Electricity Sales Inc., Enova Energy Production Inc., Özaltın Import-Export and Construction Inc., Özaltın Mining Trade and Industry Inc., Özaltın 2 Energy Investments Inc., Özaltın 3 Energy Investments Inc., Nova Investment S.A., and Pontid Mining Industry and Trade Inc.

“**Sanctions**” are restrictions imposed by one or more countries or entities on financial or commercial transactions targeting another country, region, state, or government; sector; entity; individual; aircraft; or vessel. The Republic of Turkey, the United Nations (UN), the United States Federal Government (“U.S.”), the United Kingdom, and the European Commission (“EU”) (respectively “Turkish Sanctions,” “UN Sanctions,” “U.S. Sanctions,” “UK Sanctions,” and “EU Sanctions”) and other jurisdictions.

“**Sanctioned Entity**” means:

- Any natural person, legal entity, aircraft, vessel, or government that is the direct target of sanctions (“**Designated Persons**”) (e.g., those listed on the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) *Specifically Designated Nationals and Blocked Persons List (SDN List)*);
- Entities in which Designated Persons hold a direct or indirect ownership interest of 50% or more;
- Individuals residing in, or legal entities established in, the regions of Crimea, Donetsk, Luhansk, and Sevastopol (Ukraine), Cuba, Iran, North Korea, and Syria—which are subject to comprehensive sanctions at the country or regional level as of the effective date of this Policy (“**Sanctioned Countries**”);
- Individuals and entities directly or indirectly owned or controlled by the governments of Sanctioned Countries or the Government of Venezuela.

"Corruption" is the abuse of authority for personal gain.

3. GENERAL PRINCIPLES

The Company selects Business Partners based on criteria such as technical expertise, product and service quality, pricing, corporate reputation, and financial soundness. The Company also assesses compliance risks associated with Business Partners using a risk-based approach to ensure adherence to the principles outlined in this Policy. Within this framework, the following principles are adopted:

- Taking necessary measures to effectively manage risks related to Sanctions and Export Control Regulations⁷.
- Ensuring that Business Partners are not direct or indirect Sanctions Targets, that the business relationship to be established with Business Partners does not violate any applicable Sanctions in any way, and that there is no adverse intelligence regarding the relevant Business Partners regarding Bribery, Corruption, Money Laundering, the financing of terrorism and weapons of mass destruction, human rights violations, etc., and to identify other potential compliance risks and take necessary measures, to fulfill the duty to inform in full compliance with all applicable legislation regarding the protection of personal data in the countries where the Company operates, to obtain explicit consent where necessary, Additionally, within this scope, conducting due diligence processes on individuals acting on behalf of and for the account of the Business Partner, evaluating all business operations and transactions in detail under applicable Sanctions, and obtaining all necessary commitments, to conduct a Due Diligence Assessment regularly both prior to entering into a business relationship with any Business Partner and throughout the duration of the ongoing business relationship⁸.
- To ensure compliance with applicable laws, contractual obligations, and the Company's Ethics and Conduct Principles—particularly the Guiding Principles for Business Partners ("Principles") detailed below—Business Partners must be audited as necessary to determine compliance. If required, provide Business Partners with the necessary training to ensure compliance with expected standards.

The Business Partner Onboarding Process applied in this context is outlined below:

Business and operational units, acting as the first line of defense (⁹), must identify potential risks related to Sanctions and Export Control Regulations prior to establishing any business relationship with a new Business Partner; ensure that the relevant party is not a Sanctions Target; ensure that entering into the relevant business or transaction will not constitute a violation under applicable Sanctions; and identify compliance and other reputational risks

⁷ For details, please refer to Özaltın Holding A.Ş. Sanctions and Export Controls Policy.

⁸ For details, please refer to Özaltın Holding A.Ş. Sanctions and Export Controls Policy.

⁹ Front-line roles refer to the business units responsible for delivering products and/or services to the company's customers. In these processes, which can also be described as operational matters, each front-line employee is responsible for conducting their own self-assessment regarding the risk controls they are required to perform.

related to Bribery, Corruption, Money Laundering, the financing of terrorism and weapons of mass destruction, human rights violations, etc., in full compliance with all applicable data protection legislation in the countries where the Company operates, by obtaining all necessary commitments, the Company is responsible for conducting a prohibited list check via a screening tool (“Due Diligence”) and evaluating whether the relevant parties comply with the Company’s Guiding Principles for Business Partners at¹⁰. **The screening tool to be used for this purpose has not yet been implemented, and the process of establishing the relevant system is ongoing. Until this process is completed, it is expected that necessary checks will be conducted through internet, media, and open-source searches.**

The Due Diligence Study is conducted by business and operational units under the coordination of the Legal and Compliance Department, in accordance with the second-line role¹¹, and is monitored at regular intervals. If the Due Diligence Study contains any warning signs regarding compliance risks or if it is determined that the Business Partner is a Public Official or a Person with Public or Political Influence, the Legal and Compliance Department is immediately notified. In such cases, the Legal and Compliance Department may decide to suspend the transaction or conduct an Enhanced Due Diligence (“EDD”) on the relevant individuals¹². In such cases, the identified compliance risks, their potential impact on the Company, and recommendations regarding whether to establish a business relationship, terminate an existing one, or the measures to be taken if the existing relationship continues, are reported to the General Manager and the Board of Directors. The General Manager makes the decision to initiate, continue, or terminate the business relationship by considering the assessments and recommendations included in the report and, where necessary, submits it to the Board of Directors for approval.

When the Company enters into any contract with a Business Partner, it reserves the right to terminate such contract or apply other possible sanctions if any violation of this Policy or the Principles set forth herein is detected. Provisions regarding the obligation to comply with this Policy and the Principles, as well as the Company’s right to exercise oversight over the relevant Business Partner, are included in the relevant contracts.

4. GUIDING PRINCIPLES FOR BUSINESS PARTNERS

These Guiding Principles for Business Partners (“Principles”) have been prepared in accordance with this Policy and the UN Global Compact. All of the Company’s Business Partners are expected to comply with these Principles.

4.1. Legal Regulations

¹⁰ For details, please refer to the section titled “4. Guiding Principles for Business Partners” in the Policy.

¹¹ The Compliance Function, referred to as the second line and closely linked to first-line processes, supports the first line in managing compliance risks and facilitates necessary coordination among business units. In addition to continuous monitoring activities, it proposes action plans to prevent the occurrence or recurrence of risks and supports the first line by ensuring their implementation.

¹² As the third line of defense, internal audit aims to provide independent and objective assurance and recommendations regarding the adequacy and effectiveness of governance and risk management, based on findings from past audits.

Business Partners are expected to act in compliance with all applicable laws and regulations within the scope of their activities and industries, including competition laws, legislation regarding the prevention of money laundering and the financing of terrorism and weapons of mass destruction, data privacy regulations, and legislation related to the fight against bribery and corruption.

4.2. Anti-Bribery and Anti-Corruption, and Prevention of Money Laundering and the Financing of Terrorism and Weapons of Mass Destruction

Business partners are expected to comply with applicable laws regarding anti-bribery and anti-corruption, the prevention of money laundering, and the prevention of the financing of terrorism and weapons of mass destruction while conducting activities on behalf of the Company.

Any form of bribery intended to obtain an unfair advantage or influence impartial decision-making processes, as well as the direct or indirect giving or receiving of anything of value to any third party, is unacceptable. Whether or not done in bad faith, any activity that could lead to money laundering or the financing of terrorism and weapons of mass destruction is illegal and unacceptable.

All transactions must be recorded in legal books and records in a manner that is accurate, transparent, and includes sufficient documentation.

4.3. Human Rights

4.3.1. Employment

The Company's Business Partners must ensure that their operations are not associated with child labor, forced labor, or labor exploitation.

Furthermore, the Company expects its Business Partners to adopt a "zero-tolerance" approach to slavery and human trafficking in accordance with ILO Conventions and Recommendations, the Universal Declaration of Human Rights, and the UN Global Compact.

4.3.2. Compliance with Labor Laws

Business Partners are expected to comply with the labor laws of the countries in which they operate.

The wage-setting process must be determined competitively in accordance with relevant sectors and the local labor market, and in compliance with the terms of collective bargaining agreements, if any. All wages, including social benefits, must be paid in accordance with applicable laws and regulations.

4.3.3. Prevention of Harassment and Violence

Business Partners are expected to ensure a work environment free from violence, harassment, and other unsafe or disruptive conditions arising from internal or external threats. No form of physical, verbal, sexual, or psychological harassment, bullying, abuse, or threats will be tolerated.

4.3.4. Non-Discrimination

Business Partners are expected to provide a work environment where no form of discrimination is tolerated, employees are treated fairly, and discrimination is not permitted (such as based on race, gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identity, or political views) and that they base all hiring, promotion, assignment, and training processes on a zero-tolerance policy against discrimination.

4.3.5. Freedom of Association and Collective Bargaining

Business Partners must respect their employees' rights and freedoms to join a union and engage in collective bargaining without fear of retaliation.

4.4. Health and Safety

Business Partners are expected to provide a safe and healthy work environment, comply with all relevant legal regulations, and implement all necessary safety measures for all work areas. Business Partners must immediately take necessary measures to minimize the risk of injury and accidents when unsafe conditions or behaviors arise.

4.5. Environment

The Company expects Business Partners to make every effort to protect and preserve the environment. In this context, the Company supports Business Partners in the following areas:

- Complying with all applicable environmental and safety regulations, including the Company's various plans and procedures related to health, safety, and environmental management.
- Continuously improving their environmental performance and resource efficiency.
- Reducing their environmental impact by addressing issues such as greenhouse gas emissions and energy consumption, water management, waste management, pollution prevention, and the protection of biodiversity.

- To have effective monitoring systems and procedures in place to address industrial accidents and other emergencies.
- Encourage business partners and third parties to improve their environmental performance.

4.6. Compliance with Ethical Principles and International Agreements

The Company expects its Business Partners to conduct their operations fairly, honestly, in compliance with the law, and in accordance with the Company's Ethics and Conduct Principles and the Company's Supplier Conduct Principles.

The Company expects its Business Partners to conduct all their business and transactions in accordance with the laws, international treaties to which the Republic of Turkey is a party, the United Nations Declaration of Human Rights, and the United Nations Global Compact (Global Compact), and to act in accordance with the principles of fairness, accuracy, integrity, responsibility, trust, accountability, transparency, and respect in all their business dealings.

4.7. Conflict of Interest

Business Partners must not enter into personal relationships with Company employees that could give rise to a conflict of interest—or be perceived as such—and that could harm the Company's reputation.

Business Partners, as well as other individuals and entities that may have a business relationship with the Company, and Company employees who have, or may have, a close relationship—such as kinship or friendship—with such individuals or entities, or with the Company itself (including those who employ, approve, or make decisions regarding them), are required to notify the Legal and Compliance Department of the situation.

Before establishing any direct or indirect business relationship with a former Company employee, the department that will establish the business relationship must notify the Legal and Compliance Department regarding the matter, and the necessary approval process is carried out in accordance with internal Company procedures.

4.8. Reporting

Business Partners are expected to establish effective communication channels to report violations and take necessary measures in a timely manner. Business Partners and their employees must be able to report their concerns through these communication channels without fear of retaliation or reprisal.

Business Partners' employees may report their concerns directly through www.ozaltin.com.tr/iletisim, in writing via the email address etik@ozaltin.com.tr, which is accessible to the Legal and Compliance Counsel and the Director of Audit and Organization, or anonymously through the Ethics Line Application Form available on the Company's website.

4.9. Training and Development

The Company encourages its Business Partners to provide training programs and tools to help their employees gain additional skills and competencies.

4.10. Management Systems

Business Partners are expected to have effective and functioning management systems in place to ensure they operate in compliance with laws, regulations, and the Principles set forth in this Policy.

5. AUTHORITY AND RESPONSIBILITIES

All employees and managers of the Company are responsible for complying with this Policy and for implementing and supporting the Company's relevant procedures and controls in accordance with the requirements of this Policy. To the extent applicable to the relevant party and transaction, the Company expects all Business Partners to act in compliance with this Policy and takes the necessary steps to ensure this.

In the event of a conflict between this Policy and local laws applicable in the countries where the Company operates, the more restrictive of the two—whether the Policy or the law—shall prevail, provided that the relevant application does not conflict with local laws.

If you become aware of any action that you believe violates this Policy, applicable laws, or the Company's Ethics and Conduct Principles, you may consult with your supervisor or report the matter to the Legal and Compliance Department. Alternatively, you may submit a written report through the email address etik@ozaltin.com.tr, which is accessible to the Legal and Compliance Counsel and the Director of Audit and Organization, or submit an anonymous report through the Ethics Line Application Form available on the Company's website.

Company employees may consult the Legal and Compliance Counsel, the department responsible for compliance, regarding any questions about this Policy and its implementation. A violation of this Policy by an employee may result in various disciplinary actions, including termination, in accordance with the Labor Code, other relevant legislation, and the Company's internal policies and regulations. If any third party expected to comply with this Policy acts in violation of it, the relevant contracts may be terminated.

6. EFFECTIVE DATE

This Policy entered into effect pursuant to the Board of Directors' Resolution dated April 22, 2025, and the Legal and Compliance Department is responsible for updating the Policy.

Revision	Date	Description
1	April 22, 2025	Review
2	September 26, 2025	Updates have been made to the reporting channels.
3	January 9, 2026	Updates have been made regarding access for relevant units in the reporting notification processes.
4	March 10, 2026	Terminology related to the organizational structure has been updated.
5	May 14, 2026	The Ethics Line Application Form has been added to the whistleblowing reporting channels.