

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	1 / 8

At ESAN, we adopt and implement responsible sourcing principles in all our operations. We aim to ensure that our activities and supply chain comply with internationally accepted ethical, environmental, and human rights standards. We follow the *OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas* and the requirements of the Responsible Minerals Initiative (RMI), and we apply a risk-based sourcing approach.

We expect our suppliers to be aware of their responsibilities toward their employees, affected communities, and the environment at both local and global levels. By cooperating with our suppliers, we aim to support necessary improvements and promote continuous development.

This policy covers all ESAN activities and the entire supply chain. The scope includes:

- All suppliers providing products or raw materials directly to ESAN
- ESAN's own production facilities and mining operations
- All ores and minerals purchased, processed, or traded by ESAN
- Logistics, storage, and transportation service providers

The policy applies to both domestic and international supply chains.

## 1. Ores and Minerals Covered by the Policy

This policy covers all ores and minerals produced, processed, or supplied by ESAN.

## 2. Our Commitments:

### 2.1. Compliance with Laws and International Standards

- To ensure production, processing, and trade in line with national laws and internationally recognized best practices
- To manage environmental and social risks and working conditions in line with EBRD Performance Requirements PR1 and PR2, and to ensure that our suppliers adopt the same standards

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	2 / 8

- To require suppliers to comply with ESAN's Environmental and Climate Change Policy, ESG Policy, Human Rights Policy, Occupational Health and Safety Policy, Social Impact Management Policy, and Gender and Equal Opportunities Policy

## 2.2. Prevention of Human Rights Violations

- To prevent forced labor, child labor, modern slavery, human trafficking, sexual violence, bribery, and corruption across all our activities and supply chains
- To ensure that suppliers do not directly or indirectly support armed groups
- To prevent discrimination based on race, color, gender, language, religion, political opinion, national or social origin, union membership, sexual orientation, health status, age, disability, or any other personal characteristic

ESAN has zero tolerance for all security-related human rights violations, including threats, improper use of force, illegal payments, or coercive practices by public or private security forces.

## 2.3. Prevention of OECD Annex II Risks

- ESAN is committed to identifying and preventing the risks defined in Annex II of the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas. In this context, risks such as forced labor, child labor, human rights violations, direct or indirect support to armed groups, money laundering, bribery and corruption, tax, duty and customs evasion, and the financing of terrorism are strictly unacceptable in our supply chain practices. We also expect our suppliers to comply with the same principles and to exercise due diligence regarding the risks specified in Annex II.

### Annex II Risks

Category	Risk Description
Human Rights	Forced Labor
Human Rights	Child Labor
Human Rights	Human rights violations and ill-treatment
Human Rights / Security Forces	The unlawful use of force, threats, coercive practices or illegal payments by public or

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	3 / 8

	private security forces to influence mining, transport or supply chain activities
Human Rights / Security Forces	Informal payments or non-tax transfers to security forces
Human Rights / Security Forces	Human rights violations committed by security forces
Armed Conflict	Direct or indirect support to armed groups
Armed Conflict	Revenues generated from mines controlled by armed groups
Armed Conflict	Money laundering
Financial Crimes	Bribery and corruption
Financial Crimes	Tax, duty and customs evasion
Other	Financing of terrorism

### 3. Responsible Mineral Sourcing

- We ensure that the minerals and metals we produce and supply do not support or finance illegal armed groups.
- Our mineral and metal suppliers are required to provide documentation proving their compliance with conflict-free sourcing policies.

### 4. Risk-Based Due Diligence and Management Process

ESAN applies a risk-based approach in line with the OECD five-step framework:

1. Establish strong supply chain controls
2. Identify and assess risks
3. Implement risk mitigation strategies
4. Conduct independent third-party audits
5. Report on due diligence efforts

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	4 / 8

Risk management actions include:

- Preparing risk mitigation plans with suppliers
- Requesting improvements within 3 months for low-level risks
- Ending cooperation immediately for high-level or repeated risks

## 5. Supplier Evaluation Criteria

ESAN evaluates all its suppliers according to the following criteria within the scope of its responsible sourcing approach:

### 5.1. Compliance with Policies and Standards

- Compliance with ESAN's Human Rights, Environment and Climate Change, Environmental, Social and Governance (ESG), Occupational Health and Safety, Gender Equality and Equal Opportunities, and Social Impact Management Policies is expected.
- Adherence to national legislation and internationally recognized standards (such as OECD, ILO, UNGP, ISO and EBRD requirements) is required.

### 5.2. Human Rights and Labour Rights

- ESAN expects its suppliers to comply with national and international standards regarding the prevention of child labour, forced labour and discrimination, as well as ensuring workplace safety, freedom of association, prevention of gender-based violence, harassment and unfair treatment, appropriate working hours, fair compensation, and the avoidance of involuntary agreements.
- An assessment of the supplier's workplace management practices is expected.

### 5.3. Risk Assessment and Performance

- Active participation in sustainability risk assessments is evaluated.
- Suppliers are required to provide evidence and declarations regarding the prevention of OECD Annex II risks.
- A zero-tolerance approach is applied to critical risks (e.g., forced labour, child labour, or financing of armed groups).

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	5 / 8

- The supplier's financial risk, compliance commitment score, and the risk related to being a single-source supplier are also evaluated.

#### 5.4. Transparency and Reporting

- ESAN is clearly committed to the principles of the Extractive Industries Transparency Initiative (EITI). ESAN implements EITI principles in the following ways:
  - All taxes, fees, and license payments made to public authorities are declared in accordance with relevant legislation and summarized in the annual sustainability report.
  - Companies in the supply chain are requested to declare their compliance with EITI principles.
  - Additional transparency checks (such as payment verification and supplier record reviews) are applied for imports from countries implementing EITI.
  - Anti-corruption and public transparency policies are communicated to all suppliers.
- Suppliers are expected to share complete and accurate supply chain information.
- They are required to provide conflict-free mineral sourcing documents, certificates, and third-party reports.
- They are expected to contribute to annual sustainability reporting when requested.

#### 5.5. Quality and Other Conditions

- The quality management system assessment is taken into consideration.
- Product quality performance and compliance with commercial terms and conditions are reviewed.
- Logistics performance during the supply of products is evaluated.

#### 5.6. Communications and Cooperation

- Suppliers' flexibility, cooperation, and communication performance in their business with ESAN are reviewed.

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	6 / 8

### 5.7. Environmental Practices

- Suppliers' approaches to waste and resource management, as well as biodiversity practices, are evaluated to ensure the protection and responsible use of natural resources.

### 5.8. Participation in Independent Audits

- Suppliers are expected to be open to third-party verification and audit processes when required.
- They are expected to prepare improvement plans in a timely manner in response to audit findings.

### 5.9. Conditions Requiring Immediate Termination of the Business Relationship (OECD Annex II Aligned)

If the following risks are identified during audits, ESAN will immediately terminate its business relationship with the supplier:

- Serious human rights violations (forced labour, child labour, human trafficking, sexual violence, severe abuse or ill-treatment)
- Direct or indirect financing of non-state armed groups, or providing mineral revenues or logistical support to such groups
- Financing of terrorism
- Illegal control mechanisms or extortion practices in conflict-affected areas

Termination in Case of Repetition:

For all other risks listed under OECD Annex II, ESAN expects the supplier to prepare a risk mitigation and corrective action plan.

- If the risks are not eliminated or the supplier does not demonstrate the necessary cooperation, the business relationship will be suspended or terminated.

Assessments conducted according to these criteria are regularly recorded and reflected in ESAN's relevant sustainability reports.

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	7 / 8

## 6. Ethical Business Conduct

- We are committed to conducting our business in line with ethical principles and standards, including the prevention of serious human rights violations, direct or indirect support to armed groups, corruption and misrepresentation, money laundering, and violations of tax and customs regulations.
- We expect our suppliers to comply with all relevant environmental and social requirements, including EBRD Performance Requirements, worker standards against forced labour (minimum rights and freedoms defined by organizations such as the ILO, OECD, and UN), and ILO Forced Labour Conventions (No. 29 and No. 105).

## 7. Grievance Mechanism and Reporting

- A grievance mechanism is available for employees, suppliers, and stakeholders to raise their concerns in a confidential and transparent manner.
- All reported requests, suggestions, and complaints will be promptly investigated and corrective actions will be taken when necessary.

## 8. Additional Commitments for the Supply Chain:

- ESAN applies a zero-tolerance policy against forced labour in the supply of all products it procures. Within this scope:
  - **Supplier Declaration:** Every supplier contracted with ESAN must provide a written statement confirming compliance with forced labour prevention principles in the production of their products.
  - **Supply Chain Review:** Suppliers are required to review their own supply chains and document the results of this review to ESAN. ESAN will investigate and evaluate whether suppliers are included in the approved GTS list (<https://techselector.com/turkey-en/>).
  - **Verification:** ESAN may activate independent third-party verification mechanisms when deemed necessary.
  - **Non-Compliance:** If any forced labour issue is identified:

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO

	<b>Responsible Sourcing Policy</b>	Document No:	SP-GNL-PT-001
		Issue Date:	3/2/2026
		Revision No:	0
		Revision Date:	3/2/2026
		Page No:	8 / 8

- The supplier must immediately prepare a corrective action plan,
- In cases of critical violations (such as forced labour, child labour, or human trafficking), the business relationship will be terminated without delay.
  - **Continuous Improvement:** Suppliers are required to share continuous improvement plans with ESAN to reduce human rights risks.
- Through these commitments, we aim to prevent human rights violations in our supply chain, increase transparency, and ensure full compliance with international standards.

#### 9. Review and Continuous Improvement:

This policy will be reviewed annually based on sector standards, national and international regulatory changes, and stakeholder feedback, and will be updated when necessary.

This policy entered into force on 01.02.2025 and has been published on ESAN's official website.

ESAN commits to proactively communicating this policy to all suppliers. Within this scope:

- The policy is sent to all existing suppliers via email and delivery records are maintained.
- New suppliers must accept and sign the policy during the contracting process.
- The policy remains continuously accessible on the supplier portal and in contract annexes.

Communication dates, records, and supporting documents are stored by ESAN and presented during audits when required.

PREPARED BY	REVIEWED BY	APPROVED BY
SUSTAINABILITY MANAGER	INTEGRATED MANAGEMENT SYSTEMS EXECUTIVE	CEO