

	CONFLICT MINERALS POLICY	Doküman No	PK-18
		İlk Yayın Tarihi	20.03.2024
		Revizyon Tarihi	-
		Revizyon No	-

1. Introduction

As Sarten Ambalaj, we are committed to promoting respect for human rights in our supply chain and working diligently to prevent the use of conflict minerals. Conflict minerals (tin, tantalum, tungsten, and gold) are minerals that can be obtained from regions that may contribute to the financing of armed conflicts. Our company takes various measures to prevent these minerals from entering our supply chain.

2. Purpose and Scope

The purpose of this policy is to prevent the use of conflict minerals in our supply chain and to promote transparent, responsible, and sustainable supply practices. This policy applies to all production facilities, auxiliary facilities, new investments, employees, suppliers, contractors, subcontractors, and personnel involved in contracts with other relevant organizations of Sarten Ambalaj. We require our suppliers to comply with the requirements related to the responsible extraction of minerals from conflict-affected and high-risk areas under Section 1502 of the US Dodd-Frank Act and EU Regulation 2017/821.

3. Our Policy

Sarten Ambalaj adopts the conflict minerals policy within the framework of the following fundamental principles:

- **Respect for Human Rights:** We operate in our supply chain in a manner that respects human rights and prevents the use of conflict minerals.
- **Transparency and Responsibility:** We take all necessary measures to ensure transparency in our supply chain and take responsibility for conflict minerals.
- **Certified Suppliers:** We encourage our suppliers to have national or international certifications proving they do not use conflict minerals.

4. Supplier Requirements

We expect our suppliers to meet the following requirements:

- **Declaration and Certification:** Declare that they do not use conflict minerals and certify this.
- **Transparent Reporting:** Provide regular reports that enable us to monitor the use of conflict minerals at every stage of the supply chain.
- **Audit and Compliance:** Transparency to independent audits and comply with established standards.

Hazırlayan İnsan Kaynakları Uzmanı	Onaylayan İnsan Kaynakları Direktörü
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5. Auditing and Monitoring

Sarten Ambalaj regularly conducts third-party and on-site audits of its suppliers regarding the use of conflict minerals. Audits are conducted and reported by independent audit organizations. Every stage of our supply chain is monitored using a software system, and conflict mineral risks are continuously assessed.

6. Transparency and Reporting

Sarten Ambalaj publishes an annual public report on its conflict minerals policy and practices. This report includes measures taken to reduce conflict mineral risks in the supply chain, audit results, and future goals.

7. Continuous Improvement

We develop continuous improvement processes to reduce conflict mineral risks in our supply chain. These processes aim to support suppliers in transitioning to more sustainable practices. We conduct an internal evaluation once a year to prepare and implement action plans.

8. Collaboration with External Stakeholders

We participate in industry-wide and cross-sector collaborations related to conflict minerals. We also cooperate with civil society organizations and other relevant organizations working to combat conflict minerals. These collaborations help take more effective measures in the supply chain and contribute to the development of the company's policies.

9. Management Commitment

Our Board of Directors is committed to fulfilling the requirements outlined in this policy and expects all employees to make the same commitment. We provide the necessary resources to effectively implement and maintain the policy and regularly review it.

GENERAL MANAGER

SARTEN PACKAGING