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**Arcelik**

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**Conflict  
Minerals  
Policy**

Due to its vision “Respecting the World, Respected Worldwide”, Arçelik is leading sustainability in its sector. As part of Arçelik’s commitment to maintaining the highest ethical, labor and environmental standards, Arçelik has adopted the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas. Tin, Tantalum, Tungsten, and Gold (3TG) are used in the manufacturing of electronics, home appliances and relevant products. As Arçelik, we commit to refraining from any action which contributes to the financing of conflict and to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions and to supporting our suppliers and business partners do the same. To support industry-wide approach and contribute to global responsible sourcing actions, Arçelik has been one of the members of Responsible Minerals Initiative (RMI).

As a global company, we expect from our suppliers to comply with the requirements regarding the responsible mining of minerals in conflict-affected and high-risk areas, based on the Section 1502 of U.S Dodd Frank Act and the Regulation EU 2017/821. Since Arçelik does not directly source these conflict minerals from the mines and smelters which are placed in conflict-affected and high-risk areas (CAHRAs), the supply chain consists of many stages such as smelters, traders, exporters, refiners and component producers. Therefore, to establish a responsible supply chain, from mine to final product and conduct due-diligence, Arçelik respects the “OECD Due Diligence Guidance for Responsible Chains of Minerals from Conflict-Affected and High-Risk Areas” and has integrated the five-stage framework described in the OECD Guidelines into its management system. Five stage action plan consists of;

- Establishing strong company management systems,
- Identification and the assessment of the risks in the supply chain,
- Design and implementation of a strategy to respond the risks,
- Carrying out third party audits,
- Reporting the supply chain due diligence annually.

To identify the risks in the supply chain, we require our suppliers to complete and submit “Conflict Minerals Reporting Template” (CMRT) created by RMI. Through CMRT, suppliers disclose the presence of conflict minerals (tin, tantalum, tungsten, and gold

– 3TG) in their products and provide smelter lists, which we verify through the Responsible Minerals Assurance Process (RMAP).

Additionally, as part of our voluntary commitment, we commit to assessing the use of cobalt and mica in our products, focusing on issues such as underage labor in cobalt and mica mines, worker exploitation, human rights violations, and contributions to the financing of conflict in conflict-affected and high-risk areas. To support this effort, we require our suppliers to complete and submit “Extended Minerals Reporting Template” (EMRT) developed by RMI. Through EMRT, suppliers disclose the presence of cobalt and mica in their products and provide smelter lists, which we verify to determine whether the smelters or refiners of these minerals are certified by RMAP.

Our suppliers and sub-suppliers must also adopt the Arçelik Code of Conduct for Business Partners which is similar to the international guidelines. By the Code of Conduct, we expect that our suppliers and business partners:

- Work with their own upstream suppliers, with whom potential risks may exist, to take action to mitigate these risks and suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation,
- Not offer, promise, give, or demand any bribes, and resist the solicitation of bribes to conceal or disguise the origin of minerals,
- Support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport, or export of minerals derived from the illegal taxation or extortion of minerals at access points to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers,
- Commit to engaging with suppliers, national or international governmental authorities, organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken within reasonable timescales.

To check the compliance with the code of conduct and regulations, Arçelik may perform regular third party audits and on-site audits through the supply chain.

Effective Date: 01.01.2024