



OCCUPATIONAL HEALTH AND SAFETY POLICY

1. PURPOSE AND SCOPE

Inspired by the words of our founder Mr. Nadir Tütüncü, *“Reason and intention are good partners; build friendship, not discord, between them, and life will be easier,”* our Company has embraced the core values of **Honesty, Reliability, Sustainability, Respect for People, Respect for Human Rights**, and **Closeness to Society**. With a commitment to legal compliance, ethical conduct, and respect for both people and the environment, Nadir Metal Rafineri Sanayi ve Ticaret A.Ş. (“Nadir Metal” or “the Company”) carries out all its activities in line with these principles.

At Nadir Metal, human life is the highest priority, and no task is so urgent or important that it cannot be done safely.

All employees are expected to comply with applicable occupational health and safety laws and company policies. They must report unsafe working conditions, accidents, injuries, or health risks without delay, identify emergency hazards, and be prepared to act accordingly. They must also be familiar with emergency response procedures.

This Occupational Health and Safety Policy (“Policy”) has been established to outline Nadir Metal’s approach and commitments in the field of occupational health and safety. All employees, internal and external stakeholders are expected to act in accordance with this Policy.

2. OUR COMMITMENTS

Nadir Metal has adopted and implements the ISO 45001 Occupational Health and Safety Management System (“the Management System”) to ensure a safe and healthy workplace and to prevent work-related injuries and illnesses.

Our commitments to continuously improve occupational health and safety performance in all processes, in line with our goals and national/international legislation, are as follows:

- I. To provide a work environment and conditions where employees can work safely, healthily, and with satisfaction.
- II. To adopt a proactive approach that complies with relevant standards, eliminates hazards, identifies risks with precision, addresses opportunities, identifies potential health threats, near misses, and improvement needs, and ensures continuous compliance and improvement.

NADİR METAL RAFİNERİ SAN. VE TİC. A.Ş.

PRECIOUS METALS
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- III. To minimize all types of hazards with minimal harm and to eliminate unavoidable risks using the best available techniques in a way that does not harm employees, facilities, or nature.
- IV. To operate a traceable, measurable, and goal-oriented management system for the continuous improvement of the ISO 45001 Occupational Health and Safety Management System performance.
- V. To adopt “zero accident” as a primary goal by establishing and continuously improving an effective system that prevents all potential accidents, occupational diseases, environmental damage, and nonconformities.
- VI. To identify and eliminate hazards, risks, and near misses in the work environment.
- VII. To comply with national and international occupational health and safety regulations, collective labor agreements, and other obligations across all geographies where we operate.
- VIII. To ensure effective communication to understand the needs and expectations of employees and stakeholders regarding occupational health and safety, to provide relevant training, and to monitor the effectiveness of such training.
- IX. To proactively plan for potential emergencies and take necessary precautions.
- X. To engage employees, employee representatives, and stakeholders at all levels of the organization by consulting and involving them in activities for continuous improvement in occupational health and safety.
- XI. To carry out social responsibility projects and initiatives that raise awareness of health and environmental consciousness by keeping communication channels open and considering the needs and expectations of all stakeholders.
- XII. To cooperate with public institutions and authorities.

3. STAKEHOLDER FEEDBACK

The Company values all feedback and opinions regarding this Policy. Feedback may be submitted via the channels listed below. Stakeholders may also submit anonymous reports in accordance with the Whistleblower Policy. All communications must comply with applicable data protection regulations.

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4. ENFORCEMENT

This Policy may be updated when necessary, under the authority and responsibility of the Board of Directors. Updates shall be prepared by the Occupational Health and Safety Unit and submitted to the Board of Directors for approval.

This Policy was approved by the Board of Directors and entered into force on **January 23, 2025**.

Board Resolution Date	Version No
10.10.2023	(1)
23.10.2024	(2)
23.01.2025	(3)