

CONFLICT MINERALS POLICY

Purpose

The U.S. Dodd-Frank Wall Street Reform, Conflict Minerals Regulation (EU 2017/821) and Consumer Protection Act. The rule requires companies that file certain SEC reports to disclose whether products they manufacture or contract to manufacture contain “conflict minerals” that are necessary to the production or functionality of their products. As defined in the rule, conflict minerals include cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten), gold and their derivatives. The U.S. Secretary of State has determined that conflict minerals are financing conflict in the Democratic Republic of Congo and its nine surrounding countries (the “DRC”). AKS Anahtar Kontak San. ve Tic. A.Ş. (AKS) is committed to maintaining a socially responsible supply chain and endeavors to source its materials from companies that share AKS’s values of demonstrating respect for human rights, integrity, and environmental responsibility. Therefore, AKS is issuing this policy to further promote these values and ensure compliance with the SEC conflict minerals rule.

Policy

AKS is committed to conducting its worldwide operations in a manner that complies with all applicable laws and regulations regarding conflict minerals. It is AKS policy to refrain from knowingly purchasing any products, components, or materials that contain conflict minerals which have not been verified as DRC Conflict-Free. AKS does not purchase tin, tantalum, tungsten, or gold (“3TG”) directly from smelters or mines. AKS works with its suppliers to ensure awareness and compliance with the terms of this policy.

General Manager