

MODERN SLAVERY POLICY

Zetmar Commodities & International Trading Co. Ltd. is a major supplier of steel, aluminium, wooden products, insulation materials to various industries. The company is committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand this of all who work for us and expect it of all with whom we have business dealings. Our attitude to modern slavery is a zero tolerance approach.

This statement sets down Zetmar Commodities & International Trading Co. Ltd.'s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. Staff are expected to report their concerns and management to act upon them.

Definitions

Zetmar Commodities & International Trading Co. Ltd. considers that modern slavery encompasses:

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as a commodity, or being bought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement.

Prevention of Modern Slavery

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

We expect the same high standards from all of our contractors, suppliers and other business partners, and we are always evolving and updating our contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect our suppliers to hold their own suppliers to the same high standards.

All employees and employers have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.



Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain. Our Whistleblowing policy is intended to provide guidance on how concerns can be communicated to the company. Concerns about suspected modern slavery associated with the company or our suppliers may be reported by team members in this manner.

The Whistleblowing policy applies to team members and may be found as a separate policy available on the Company's code of conduct and from HR. The nature of the complaint will determine the Company's next course of action.

Raising Awareness

Zetmar Commodities & International Trading Co. Ltd. raises awareness internally of its policies and ethical standards through a variety of methods, including training and awareness sessions. We continue to look at how to raise awareness on the risks of modern slavery and human trafficking amongst our procurement and HR team and will use this statement as a platform for that.

Yusuf Çağlar Özpınar

Founder