

MODERN-DAY SLAVERY CORPORATE STATEMENT

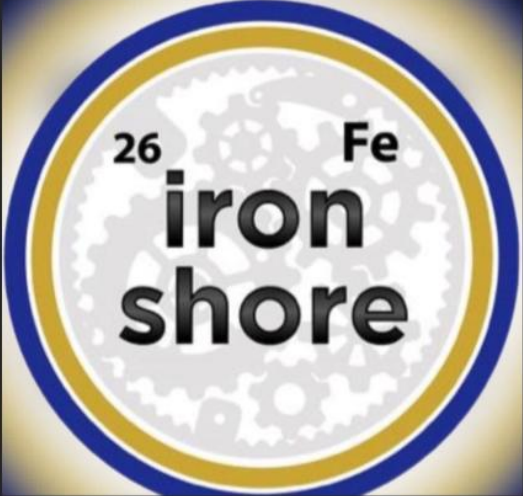




TABLE OF CONTENTS

Introduction Letter	03
About Our Firm	04
Our Operations	05
Supplier Code Of Conduct	06
Supply Chain Audit	07
Risk Assessment Process	08
Training and Awareness	09
Supplier Engagement	10
Reporting and Accountability	11
Transparency	12
Conclusion	13

INTRODUCTION

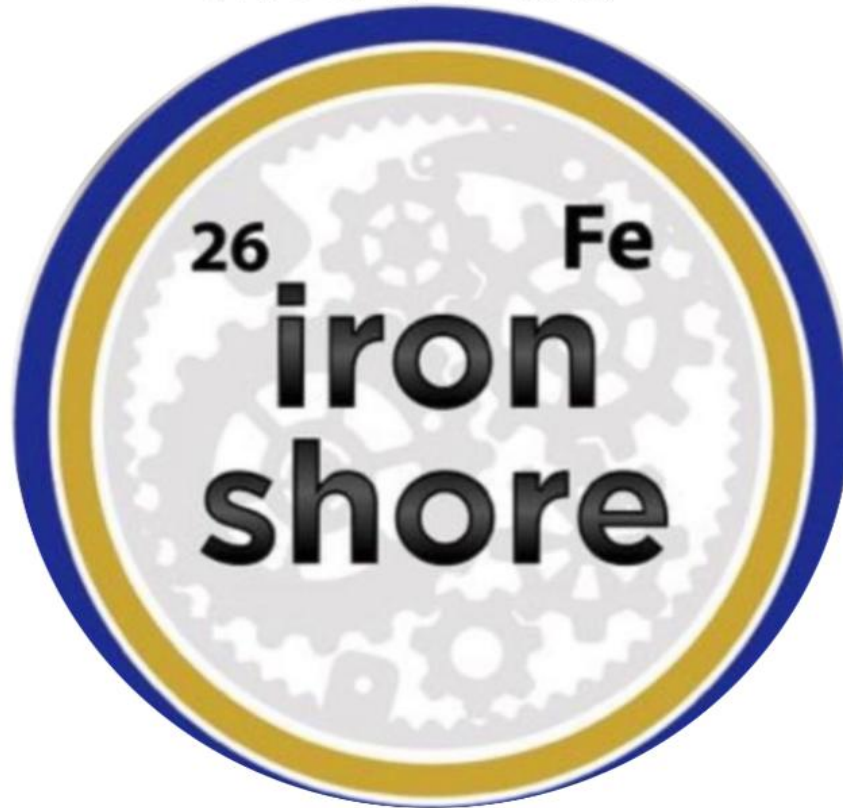
At Iron-Shore, our commitment to ethical practices and social responsibility is unwavering. We firmly adhere to the principles set forth in the Modern Slavery Act 2015, recognizing the imperative to combat modern slavery and human trafficking comprehensively. These abhorrent practices have no place in our operations or supply chains, and we are resolute in our efforts to eradicate them.

Our dedication to this cause stems from a deep-seated belief in the inherent dignity and rights of every individual. We understand that modern slavery takes various insidious forms, depriving individuals of their freedom, dignity, and basic human rights. As such, we have taken proactive measures and will continue to do so to ensure that our business remains free from any association with such egregious violations.

This statement serves as a testament to our ongoing commitment and outlines the concrete steps we have implemented to address modern slavery and human trafficking. By fostering transparency, accountability, and collaboration, we aim to create a supply chain ecosystem that upholds the highest ethical standards and safeguards the well-being of all individuals involved.

As we navigate the complexities of a globalized economy, we recognize the importance of collective action in combating these pervasive injustices. We stand firm in our resolve to be part of the solution, actively engaging with stakeholders, partners, and communities to effect meaningful change. Together, we can build a world where exploitation and coercion have no place, and where every person can live and work with dignity and respect.

ABOUT US



Iron-shore is a leading representative of metal manufacturing, construction suppliers, and metal machinery producers in Turkey, with an extensive network of high-quality manufacturers situated in major cities such as Istanbul, Izmir, Ankara, Adana, and Mersin. Our presence is well-established throughout the country, allowing us to offer top-notch products and services to our clients.



Central to our operational ethos is a strong emphasis on regulatory compliance, ethics, and corporate social responsibility. We maintain a zero-tolerance policy for non-compliance with regulations and for any form of modern-day slavery or human trafficking in our operations and supply chains.



Driven by a culture of continuous improvement, both in our products and processes, we are committed to extending the principles of quality and innovation to our social and ethical practices.



Iron-Shore leads the way in sustainable and innovative building materials

OUR OPERATIONS



Procurement



Customer Service



Quality Control



Distribution

In each facet of our operations, we demonstrate a commitment to the highest standards of ethics and lawful conduct. Our engagement with stakeholders, both internal and external, is based on principles of integrity, respect, and fair treatment.



LAW Responsibility Prevention
Compliance **RULES**

SUPPLIER CODE OF CONDUCT

Obligations **Environment** RIGHTS
POLICY **HEALTH** SAFETY Guidelines
Regulations

At Iron-Shore, our commitment to ethical business practices extends beyond our internal operations to encompass our relationships with suppliers. The Supplier Code of Conduct serves as a cornerstone in guiding our interactions with suppliers, articulating the standards and expectations they must meet to engage in business relationships with us.

Within the Supplier Code of Conduct, we emphasize principles such as fair labor practices, non-discrimination, health and safety standards, environmental sustainability, anti-corruption measures, and respect for intellectual property rights. These principles reflect our core values and our dedication to conducting business in a manner that upholds integrity and respects human rights.

To ensure that our suppliers fully understand and embrace these principles, we engage in regular communication and reinforcement efforts. This includes conducting training sessions, workshops, webinars, and providing written materials to educate our suppliers on our expectations. Through these efforts, we empower our suppliers to align their practices with our ethical standards and foster a culture of compliance and responsibility.

In addition to education, we implement robust mechanisms for monitoring and evaluating supplier compliance with our code. This involves conducting audits, inspections, and assessments to verify adherence to our specified requirements. In cases of non-compliance, we work collaboratively with our suppliers to address issues, implement corrective actions, and drive continuous improvement.

Moreover, our Supplier Code of Conduct serves as a tool for fostering trust and accountability within our supply chain. It communicates to our stakeholders, including customers, investors, employees, and the broader community, that Iron-Shore is committed to conducting business in a responsible and ethical manner. By holding our suppliers accountable to these shared values, we promote a culture of integrity, transparency, and sustainability throughout our operations, strengthening our reputation as a trusted and responsible corporate citizen.

SUPPLY CHAIN AUDIT

At Iron-Shore, we prioritize ethical sourcing and responsible business practices across our supply chains. Central to this commitment is the regular auditing of our suppliers to ensure alignment with our Supplier Code of Conduct. These audits serve as a critical mechanism for assessing various aspects of our supply chain operations, with a particular focus on working conditions, fair wages, and other factors pertinent to identifying and mitigating modern slavery risks.

Through these comprehensive audits, we delve into the working conditions prevalent within our suppliers' facilities, examining factors such as workplace safety, hygiene standards, and employee welfare initiatives. We place a premium on fostering environments that prioritize the well-being and dignity of all individuals involved in our supply chain, from factory workers to administrative staff.

Moreover, our audits meticulously scrutinize wage structures to ascertain that all workers receive fair compensation for their labor, in accordance with both legal requirements and industry standards. Ensuring equitable remuneration not only upholds our ethical principles but also contributes to fostering sustainable livelihoods for workers and their families.



RISK ASSESSMENTS

		Severity				
		Negligible	Minor	Moderate	Significant	Severe
Likelihood	Very Likely	Low	Low Med	Med Hi	High	High
	Likely	Low	Low Med	Medium	Med Hi	High
	Possible	Low	Low Med	Medium	Med Hi	Med Hi
	Unlikely	Low	Low Med	Low Med	Medium	Med Hi
	Very Unlikely	Low	Low	Low Med	Medium	Medium

At Iron-Shore, our approach to risk assessment is both dynamic and comprehensive, reflecting our unwavering commitment to combating modern slavery across our supply chains. We recognize that understanding the nuanced interplay of various factors is essential in effectively identifying and addressing vulnerabilities.

Geographic location stands out as a key determinant in our risk assessment methodologies. We acknowledge that different regions may present distinct challenges and nuances related to modern slavery, influenced by socioeconomic conditions, regulatory frameworks, and cultural practices. Through meticulous analysis of the geographical footprint of our suppliers, we can pinpoint areas of heightened risk and tailor our strategies accordingly. This proactive approach allows us to allocate resources strategically and implement targeted mitigation measures where they are most needed.

Moreover, we recognize the critical role that industry sector dynamics play in shaping modern slavery risks. Industries characterized by labor-intensive operations, such as manufacturing or agriculture, inherently face greater vulnerabilities due to the potential for exploitation of vulnerable workers. By deeply understanding the specific challenges and dynamics within each sector, we can tailor our risk mitigation efforts effectively. This may involve implementing enhanced supplier oversight mechanisms, conducting capacity-building initiatives, or collaborating with industry peers to drive systemic change.

By integrating geographic considerations and industry-specific insights into our risk assessment methodologies, we strive to stay ahead of emerging threats and proactively address modern slavery risks throughout our supply chains. Our commitment to dynamic and multifaceted risk assessment underscores our dedication to upholding ethical standards and safeguarding human rights across all aspects of our operations. At Iron-Shore, we remain steadfast in our pursuit of a supply chain free from exploitation and abuse, guided by a relentless commitment to integrity and social responsibility.



TRAINING AND AWARENESS

Our training initiatives are not merely a compliance requirement; they are a cornerstone of our organizational ethos. We understand that equipping our workforce with the knowledge and tools to recognize and address modern slavery risks is essential to upholding our values and protecting the rights and dignity of vulnerable individuals within our supply chains.

These training programs are thoughtfully curated and regularly updated to reflect emerging risks, evolving regulatory frameworks, and best practices in the field. We leverage a combination of instructional materials, interactive modules, and real-world case studies to ensure that our employees gain a nuanced understanding of the complexities surrounding modern slavery and human trafficking.

Through our training, employees learn to identify red flags indicative of potential exploitation or coercion, such as irregularities in recruitment practices, substandard working conditions, or restrictions on freedom of movement. They also receive guidance on the appropriate channels for reporting concerns and accessing support mechanisms, fostering a culture of accountability and empowerment throughout the organization.

By instilling a deep sense of responsibility and vigilance among our workforce, we strive to create a network of informed advocates who are equipped to safeguard human rights and integrity across all facets of our operations. At Iron-Shore, we believe that by arming our employees with knowledge and fostering a collective commitment to ethical conduct, we can effect meaningful change and contribute to the eradication of modern slavery and human trafficking from our supply chains and beyond.

SUPPLIER ENGAGEMENT

High un
Low understanding

Slow and low quality interactions with suppliers

Fast but low quality interactions with suppliers

Supplier engagement is a cornerstone of our commitment to combating modern slavery within our supply chain. We firmly believe that collaboration is essential in addressing the complexities surrounding this issue. Instead of merely imposing regulations, we actively partner with our suppliers, fostering a deep understanding of the challenges and nuances involved.

Through continuous dialogue and partnership, we aim to empower our suppliers with the knowledge and tools necessary to identify, assess, and address potential instances of exploitation within their own operations. This collaborative approach extends beyond mere compliance, embracing a culture of continuous improvement and shared responsibility.

Central to our engagement initiatives is the provision of comprehensive resources tailored to the specific needs of our suppliers. We understand that each organization operates within unique contexts and faces distinct challenges. Therefore, we work closely with our suppliers to offer practical guidance and best practices, enabling them to effectively combat modern slavery.

By fostering a collaborative environment and investing in the education and empowerment of our suppliers, we strive to create a supply chain that is not only compliant but also ethically sound and socially responsible. Together with our partners, we are committed to driving positive change and eradicating modern slavery from our operations and beyond.



REPORTING AND ACCOUNTABILITY

Our whistleblowing framework serves as a vital channel through which any suspicions or observations related to modern slavery and human trafficking can be reported promptly and confidentially. We understand the gravity of these issues and recognize that early detection and intervention are paramount in preventing harm and upholding human rights.

Upon receiving a report, our dedicated team conducts thorough investigations, ensuring that every concern is meticulously examined and evaluated. We adhere to a rigorous protocol that respects the confidentiality and anonymity of whistleblowers while prioritizing the integrity and transparency of the investigative process.

We recognize that effective response mechanisms are essential to fostering trust and accountability within our organization and across our supply chain. Therefore, we are committed to taking swift and decisive action in response to substantiated reports of modern slavery and human trafficking. This may include implementing corrective measures, terminating relationships with non-compliant suppliers, or collaborating with relevant authorities to pursue legal action against perpetrators.

Furthermore, we believe in the importance of ongoing education and awareness-raising efforts to empower our stakeholders to recognize the signs of exploitation and understand their role in preventing it. Through training programs, informational resources, and regular communications, we strive to foster a culture of vigilance and ethical responsibility throughout our organization and beyond.

At Iron-Shore, we view whistleblowing not only as a mechanism for reporting wrongdoing but also as a cornerstone of our commitment to integrity, accountability, and social responsibility. By maintaining a steadfast dedication to transparency and ethical conduct, we endeavour to create a safer, more equitable world for all.



TRANSPARENCY

At Iron-Shore, our commitment to eradicating modern slavery and human trafficking is ingrained in the very fabric of our corporate identity. We firmly believe that transparency is pivotal in addressing these pressing issues, as it fosters accountability, encourages open dialogue, and drives meaningful action.

Central to our transparency efforts is the annual publication of our Modern Slavery Act statement. This comprehensive document serves as a testament to our ongoing dedication, outlining our progress, initiatives, and achievements in combating modern slavery and human trafficking across all aspects of our operations. We meticulously detail our strategies, actions taken, and results achieved, providing stakeholders with a transparent view of our efforts to uphold ethical standards and protect human rights.

However, our commitment to transparency transcends mere compliance with regulatory requirements. We recognize the urgency of the cause and actively leverage various communication channels to ensure widespread awareness of our initiatives. Whether through regular updates on our website, engagement with stakeholders through social media platforms, or participation in industry forums and events, we proactively disseminate information about our efforts to combat modern slavery and human trafficking.

Furthermore, we embrace collaboration as a cornerstone of our approach. We actively seek opportunities to partner with governmental agencies, non-governmental organizations, and industry peers to amplify our impact and drive systemic change. By fostering partnerships and sharing best practices, we strive to maximize our collective efforts in tackling modern slavery and human trafficking, ultimately contributing to a more ethical and sustainable future.

At Iron-Shore, transparency is not just a commitment; it's a guiding principle that underpins our actions and shapes our relationships with stakeholders. Through open communication, collaboration, and unwavering dedication, we remain steadfast in our mission to create a world free from exploitation and abuse.



CONCLUSION

At Iron-Shore, we understand that the fight against modern slavery and human trafficking demands perpetual vigilance and united action. We are resolutely dedicated to refining our processes and joining forces with stakeholders throughout our supply chains to confront these pressing challenges head-on. Through our shared commitment and collaborative endeavors, we are confident that we can effect substantial change in the battle against modern slavery and human trafficking.

Our pledge to combat these egregious violations of human rights is not just a matter of obligation; it's a moral imperative that drives us to continuously elevate our standards and practices. We remain steadfast in our commitment to implementing robust measures that prevent and address modern slavery and human trafficking within our operations and beyond.

Furthermore, we recognize that sustainable progress in this endeavor can only be achieved through collective action. We are actively engaged in fostering partnerships with our suppliers, industry peers, governmental agencies, and civil society organizations to exchange knowledge, share best practices, and pool resources. By harnessing the strength of our collaborative efforts, we can amplify our impact and drive systemic change throughout the global supply chain landscape.

At Iron-Shore, we firmly believe that every step we take towards eradicating modern slavery and human trafficking, no matter how incremental, brings us closer to a world where every individual is treated with dignity and respect. By remaining vigilant, continuously improving our practices, and fostering collaboration, we are committed to making a tangible and lasting difference in the lives of those affected by these heinous crimes. Together, we can build a future where freedom and justice prevail for all.

Signed : Nicole Mollet
Director Iron-shore LTD
Date: 09.01.2024