



**SARBAK METAL TİC. ve SAN. A.Ş.**  
**DECLARATION OF CONFORMITY**

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### 1. SARBAK METAL'S COMPANY PROFILE

**SARBAK METAL** manufacturer of brass rods since 1976. Initially, it was a facility that casts pyrometallurgically in crucible furnaces, uses fuel energy in wedge annealing, and works with simple extruders and drawing machines with limited functions. Over time, it has made great strides and developed itself, and has become working with a technology worthy of the millennium. All kinds of brass rods and profiles, hollow brass rods and profiles, as well as brass ingot casting and brass billets up to Ø 300 mm are our other production types. Customer satisfaction has been accepted as our primary duty. We provide this priority by producing in accordance with world standards, quantity and delivery dates. We started production in our new factory in 2002. We are taking firm steps forward to the future by increasing our capacity and quality with all the advantages brought by technology. Sarbak Metal will continue to be at the service of the brass industry with its 22000 m<sup>2</sup> area and more than 200 employees, as well as its administrative and technical staff.

### 2. SARBAK METAL'S VISION

- To be the most innovative business and
- To be the preferred supplier.

### 3. COMPANY VALUES

**SARBAK 's** Values are as follows:

- To satisfy our customers with superior quality and value
- To provide investors with continuous, high-quality growth and attractive returns
- To be a company that its employees will be proud to be a part of.
- It aims to respect our social and physical environment.

### 4. SOCIAL RESPONSIBILITY

- **EMPLOYMENT OF CHILD LABOR:** SARBAK METAL does not employ child labor. His attitude and behavior in this regard is in line with national and international laws, regulations and the sensitivities of our society.
- **FORCED LABOR:** Forced labor, slave labor, etc. it is forbidden. Employees should be employed voluntarily. Employees always have the right not to work and to terminate the employment contract. In addition, mental pressure, sexual or personal harassment of employees is prohibited.
- **FAIR WAGE:** The nature of the job, legal requirements (minimum wage determined by the competent authorities), working year, position of the employee, competence, etc. A fair wage policy is applied by considering the criteria.
- **FAIR WORKING HOURS:** Working hours determined in accordance with legal requirements and/or industrial standards must be complied with. Employees must take one (1) day of weekly leave after working six (6) consecutive days.
- **FREEDOM OF UNION:** The right of employees to form and join unions of their choice and to bargain collectively should be respected.

- **PROHIBITION OF DISCRIMINATION:** No one in Sarbak Metal; religion, creed, sexual identity, race, skin color, social class, disability, ideology, political opinion, ethnic and national origin, age, pregnancy, etc. cannot be prosecuted or abused.
- **HEALTH PROTECTION:** A safe and healthy working environment should be provided for employees. A safe and healthy working environment should be guaranteed by the active implementation of management systems.
- **CONFLICT MINERALS:** Sarbak Metal A.Ş. brass producer. The raw materials we use in brass production are Copper, Zinc and Lead. Our alloy contains Tin, but Tin comes from scrap. We do not purchase Tin, Tungsten, Gold and Thallium as raw materials. The raw materials we purchase are from Türkiye and Europe. We do not purchase raw materials from the Democratic Republic of Congo.

## 5. ECOLOGICAL RESPONSIBILITY

- **WASTE WATER TREATMENT AND DISPOSAL:** Industrial and domestic wastewater must be treated in accordance with legal regulations. As Sarbak Metal, we give our industrial and domestic wastewater to the Çerkezköy Organized Industrial Zone Directorate "Waste Water Treatment Plant" with a "Channel Connection Permit".
- **AIR AND NOISE EMISSIONS:** Sarbak Metal complies with legal requirements for noise and air emissions. We have an EXEMPTION for noise and ENVIRONMENTAL PERMISSION for air emissions. We have a OUT OF SCOPE letter issued by the relevant competent authority for Greenhouse Gas emissions.
  - **Monitoring of Greenhouse Gases:** As a result of the study conducted on the production processes of our facility, "the GWP<sup>1</sup>-GHG<sup>2</sup> value for one (1) ton of brass product is 1.071 kg CO<sub>2</sub> eq". \*The value given in this section is a general data for an average of one (1) ton of brass product made in our company's processes.
- **WASTE AND DANGEROUS MATERIALS:** As Sarbak Metal, hazardous and non-hazardous wastes generated as a result of the process are determined and action is taken in accordance with legal regulations. All legal requirements are followed for dangerous goods taken into the facility and appropriate action is taken.
- **REDUCING NATURAL RESOURCES AND RAW MATERIALS CONSUMPTION:** As Sarbak Metal, it is ensured that activities are carried out to reduce the use of natural resources and raw materials and increase efficiency within the scope of ISO 14001 and ISO 50001 management systems.
- **ENERGY CONSUMPTION AND EFFICIENCY:** As Sarbak Metal, it carries out positive activities on energy consumption and efficiency within the scope of ISO 50001 management system.

## 6. ETHICAL PRINCIPLES

- **FAIR COMPETITION:** Fair business practices, fair advertising and fair competition standards must be complied with.
- **PRIVACY / DATA PROTECTION:** The successful implementation of SARBAK METAL's work is based on cooperation, mutual trust and respect among its employees. All observations, discussions and written information made in SARBAK METAL will be handled confidentially by SARBAK METAL employees. Under no circumstances will it share information about production or management practices with third parties.
- **INTELLECTUAL PROPERTY:** Intellectual property rights must be respected; Technology and know-how transfer will be made in a way that protects intellectual property rights and customer information.
- **HONESTY / BRIBERY, BENEFIT:** Trust, honesty and respectability values are at the core of SARBAK METAL and are important for its sustainability principle. We start our relations with our employees on this basis and our relationship will develop with constant respect for these values. It is important that all SARBAK METAL employees and external business partners understand SARBAK METAL's stance on corruption and its prevention. It is important that the parties inform SARBAK METAL about their conflicts of interest. This is derived from SARBAK METAL's anti-corruption approach and should be adopted by all employees. SARBAK METAL must constantly ensure trust and transparency within the business relationship. SARBAK METAL employees cannot corrupt or take bribes. Likewise, customers, suppliers, etc. in relation with SARBAK METAL. no third party may attempt bribery or engage in corruption. Possible conflicts of interest should be disclosed by the parties.
- **FINANCIAL RESPONSIBILITY:** Responsible financing is at the core of our duty to contribute to society and the environment. We consider it our responsibility to evaluate the environmental and social impacts of the projects we directly or indirectly finance. We care that our suppliers and customers comply with environmental, social and ethical rules.

## 7. ENSURING COMPLIANCE BY ALL STAKEHOLDERS: All our stakeholders are expected to comply with the rules listed above and also determined by national and international laws. We always have the right to audit our stakeholders regarding compliance with these practices.

## 8. LEGAL REQUIREMENTS:

- **PRODUCT AUDIT:** The products produced within SARBAK METAL are manufactured to meet E N standards specifications. The certificates of our products are prepared in accordance with 10204 standard, article 3.1. All necessary controls are carried out in our ISO 17025 accredited laboratory. It is proved that our productions are not inappropriate / fake / copy / unlicensed, etc. with the tests we carry out in our

accredited laboratory. We also expect our suppliers to prove that the materials we receive are not inappropriate / fake / copy / unlicensed, etc.

#### OUR PRODUCTS

- Mercury free
- PCB free
- Does not contain asbestos
- Does not contain chemicals that deplete the ozone layer
- Does not contain ammonia
- Chloride and sulfur free

- **GLOBAL TRADE:** We comply with applicable trade laws and regulations, including those relating to import and export controls, trade sanctions, and customs procedures, and we expect our business partners to do the same. Implements controls to mitigate risks associated with trade and export controls, including appropriate screening of transactions that may involve embargoed or sanctioned countries, processes that facilitate compliance with export control restrictions, and systems and training to ensure accurate disclosures to trade authorities.

**SARBAK METAL** follows the national and international laws and regulations listed in table 1.

No	REGULATION NAME	LEGAL OBLIGATION	FOLLOWED SUBJECT	DOCUMENT
1.	REACH	To be able to export to EU member states	Substance registration obligation in mixed products, SVHC tracking in article products	DEK-01,02,03,04,13
2.	CLP	To be able to export to EU member states	Is there a classification requirement?	DEK-05
3.	ROHS	Limit value control in product component	Lead content limit value	DEK-06
4.	CONFLICT MINERALS	human rights protection	Supply of raw materials from conflict areas	DEK-07
5.	850/2006/EC POP	Product content control	The absence of the substances in APPENDIX 1 and APPENDIX 2 in our products	DEK-10
6.	SOR/2012-285	Toxic control	The absence of substances in the declaration lists in our products	DEK-11
7.	KKDİK	In order to maintain production activities in TURKEY	Substance registration obligation in mixed products, SVHC tracking in article products	-
8.	SEA	In order to maintain production activities in TURKEY	Classification, labeling, packaging	-
9.	BEKRA (SEVESO)	Hazard monitoring of chemicals used in the facility	According to the collection rule, the company load is determined and compliance with the regulations is followed.	-

10.	GREENHOUSE GAS EMISSIONS	Monitoring greenhouse gas emissions	It is monitored whether it is within the scope according to the thermal power.	-
11.	KSTK REGULATION	Pollutant release and transport data tracking and reporting	Data for each year are reported by the end of March of the following year.	-
12.	SKHKKY	Emission measurements	Confirmation measurements are made every 2 years with the MELBES application.	Emission Measurement Report (external laboratory)
13.	ENVIRONMENTAL PERMISSION LICENSE REGULATION	Obtaining permission and license in the subject titles	Permit license conditions are followed and renewed every 5 years and / or in case of a change in the conditions.	-
14.	MANAGEMENT OF FLUORED GREENHOUSE GASES	Not using prohibited equipment and gas and checking for leaks	Two out of four (4) items in inventory at least every 6 months, the other two at least every 12 months	Leakage control report (external company)
15.	HEALTH AND SAFETY REGULATIONS FOR THE USE OF WORK EQUIPMENT	Controls for the safe use of work equipment	Every 12 months based on previous report date	PTK report (external lab)
16.	REGULATION ON OCCUPATIONAL HYGIENE MEASUREMENTS	Determining the conditions of occupational hygiene measurements	As long as there are no process changes, etc. significant changes, within the periods determined by the company (Sarbak makes it every 2 years)	Accredited Laboratory
17.	REGULATION ON HEALTH AND SAFETY MEASURES IN WORKING WITH CHEMICAL SUBSTANCES	Occupational exposure limit, biological limit values and health surveillance measures	at least once a year	external laboratory
18.	OCCUPATIONAL HEALTH AND SAFETY LAW Nr. 6331 AND WORKPLACE DOCTOR AND OTHER HEALTH PERS. REGULATION ON DUTY, AUTHORITY, RESPONSIBILITY AND TRAINING	Employee health examinations	at least once a year	Occupational physician + external laboratory

**TABLE1: NATIONAL AND INTERNATIONAL LAW AND REGULATIONS FOLLOW TABLE**

<sup>1</sup>: GWP: Global Warming Potential (Küresel Isınma Potansiyeli-KIP)

<sup>2</sup>: GHG: Greenhouse Gases (Sera Gazları)

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