

## 1. FOREWORD

İSGOLD Altın Rafinerisi A.Ş. is committed to the principle of sustainability by adhering to the highest ethical, moral, and social responsibility standards. Through a culture of honesty, transparency, and integrity, we aim to build trust with our clients, business partners, and stakeholders.

İSGOLD ensures that all its operations comply with applicable laws and international standards, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG). Our commitment to ethical sourcing extends throughout our entire supply chain—from sourcing precious metals to refining, manufacturing, and delivery of finished products.

## 2. SCOPE

This policy applies to all precious metals handled by ISGOLD and all business partners, including miners, mining companies, scrap dealers, refiners, and metal traders. ISGOLD's supply chain due diligence framework ensures that all sourced precious metals originate from legitimate, ethical sources and are free from links to crime, armed conflict, or human rights abuses.

Our definition of 'high risk' aligns with Annex II of the OECD Due Diligence Guidance (DDG) and the LBMA Responsible Sourcing Program. The Compliance Officer has the authority to reject any business relationships deemed 'high risk,' while senior management retains ultimate responsibility for ISGOLD's engagement in the precious metals supply chain.

From the outset, a philosophy of risk assessment, evaluation, monitoring, and control has been central to our business culture. We actively monitor and mitigate all material and potential risks in every aspect of our operations, from sourcing precious metals feedstock to refining, trading, manufacturing, and delivering finished products.

This Policy provides a framework for supporting global efforts and fostering active cooperation with ISGOLD's clients and business partners to ensure that precious metals come from legitimate, ethical sources and have not been associated with crime, armed conflict, or human rights abuses. It is our firm conviction and unalterable policy to refuse any business proposal that may be connected to illegitimate activities.

**PREPARED BY:**

Integrated Management Systems  
Representative

**APPROVED BY:**

Internal Control and Supply Chain Compliance  
Officer

Our definition of 'high risk' is consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG) and the LBMA standards. The Compliance Officer at ISGOLD has the authority to deny any new business relationship classified as 'high risk.' Senior management maintains ultimate control and responsibility for ISGOLD's engagement in precious metals supply chains in accordance with the ISGOLD Due Diligence Manual.

Our supply chain due diligence and associated commitments, policies, and practices are in line with the OECD Due Diligence Guidelines (DDG), the OECD DDG Supplement on Gold, the Responsible Jewellery Council standard, the LBMA Responsible Gold Guidance, the LBMA Responsible Silver Guidance, the BORSA Istanbul Responsible Precious Metals Supply Chain Guidance, and relevant local legislation from the Financial Crimes Investigation Board (MASAK). These efforts are aimed at combating human rights abuses, avoiding contributions to conflict, and preventing white-collar crimes, including compliance with standards on anti-money laundering (AML) and combating the financing of terrorism (CFT).

### 3. OUR COMMITMENT

We are committed to ensuring that all sourcing activities are conducted ethically and responsibly, minimizing the risk of contributing to conflict, human rights abuses, or other risks associated with high-risk areas.

In line with our responsible sourcing principles, ISGOLD is committed to:

- **OECD Due Diligence Guidance** : At ISGOLD, we are dedicated to upholding the highest standards of responsible sourcing in alignment with international guidelines. As part of our commitment to Due Diligence Policy, we have established and communicated a comprehensive Supply Chain Policy for Sourcing Gold from Conflict-Affected and High-Risk Areas.

Our policy is fully consistent with Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. It incorporates the following key principles:

#### **Policy Development and Communication:**

- ISGOLD has fully incorporated the OECD Guidance and its Supplement on Gold into our supply chain management practices.
- ISGOLD has developed a detailed supply chain policy that explicitly addresses the risks identified in Annex II of the OECD Guidance.

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Integrated Management Systems Representative	Internal Control and Supply Chain Compliance Officer

- This policy has been communicated to all relevant suppliers and stakeholders to ensure alignment across the supply chain.

#### **Supplier Due Diligence Requirements:**

- All suppliers are required to comply with the policy by implementing their own due diligence practices and providing evidence of responsible sourcing.

#### **Public Disclosure:**

- To maintain transparency, our supply chain policy is publicly available on our official website, reflecting our commitment to accountability.

#### **Continuous Monitoring and Improvement:**

- ISGOLD conducts regular assessments and reviews of its due diligence practices to address emerging risks and improve implementation strategies.

#### **Risk Assessment and Management:**

- We conduct thorough due diligence across all levels of our supply chain to address risks associated with conflict-affected and high-risk areas.
- Regular monitoring and auditing processes ensure adherence to these guidelines.

**Zero Tolerance for Abuses:** ISGOLD will not engage in or tolerate any activities linked to serious human rights abuses such as:

- Torture, cruel, inhuman, and degrading treatment;
- Forced or compulsory labor;
- Child labor, as defined by the ILO Convention No. 182;
- Human trafficking, sexual exploitation, and other gross violations of human rights;
- War crimes, crimes against humanity, or genocide.

**High-Risk Business Relationships:** ISGOLD will not enter into, or will immediately suspend, any business relationships where there is a reasonable risk that counterparties are involved in serious abuses or illegal activities, including support to non-state armed groups or illegally acting security forces. We will work with our counterparties to assess, mitigate, and prevent future risks.

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**Public or Private Security Forces:** İSGOLD ensures that any engagement with public or private security forces follows the Voluntary Principles on Security and Human Rights, safeguarding mine sites, workers, and surrounding communities without engaging in extortion or other illegal activities.

**Anti-Bribery and Anti-Corruption:** İSGOLD strictly prohibits bribery and corruption in all forms. We will not offer, solicit, or accept any bribes or engage in improper financial practices that conceal the origin of precious metals, misrepresent taxes, fees, or royalties paid to governments.

**Environmental and Social Governance (ESG):** İSGOLD is committed to minimizing environmental impacts by implementing ISO 14001 certified environmental management systems. We actively engage in biodiversity conservation, responsible waste management, and continuous improvement to reduce energy and water use, as well as greenhouse gas emissions.

#### **4. LABOUR & HUMAN RIGHTS**

İSGOLD is dedicated to protecting the rights of workers and local communities impacted by our supply chain. We require our suppliers and partners to comply with the following standards:

- **Child Labour:** We strictly adhere to international standards prohibiting child labor, ensuring that no individual under the age of 18 is employed in hazardous work.
- **Forced Labour:** İSGOLD rejects all forms of forced labor, including debt bondage and servitude. We ensure that all workers operate in a free and voluntary work environment.
- **Freedom of Association:** Workers have the right to freely associate and engage in collective bargaining.
- **Non-Discrimination:** We ensure equal opportunities and prohibit discrimination based on gender, ethnicity, or other protected characteristics.
- **Fair Remuneration:** We ensure that employees receive fair wages, and we require our suppliers to comply with local wage laws to meet workers' basic needs.

#### **5. ANTI-MONEY LAUNDERİNG (AML) & COUNTERING THE FINANCING OF TERRORISM (CFT)**

İSGOLD supports global efforts to eliminate money laundering and the financing of terrorism within the precious metals supply chain. We comply with all relevant laws and regulations, including those set by the Financial Crimes Investigation Board (MASAK). Any suspicious financial transactions are promptly reported.

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 <p>İSGOLD — ALTIN RAFİNERİSİ A.Ş. —</p>	<p><b>PRECIOUS METALS SUPPLY CHAIN POLICY</b></p>	<p>Document No : UYM-PLE-05 Page No : 5/6 Rev. No/Date : 5/01.11.2024 Publication : 01.11.2019 Date</p>
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## 6. NON-STATE ARMED GROUPS

İSGOLD prohibits any support, direct or indirect, to non-state armed groups through the extraction, transport, or trade of precious metals. We do not tolerate the involvement of groups that:

- Illegally control mine sites or transportation routes;
- Engage in illegal taxation or extortion along the supply chain.

## 7. PRECIOUS METALS SOURCING PROCESS

İSGOLD ensures that all precious metals come from ethical, legitimate sources. We maintain robust due diligence processes that include:

- **Know Your Customer (KYC):** Before entering into any business relationship, İSGOLD conducts a thorough KYC process based on a risk-based approach. This includes regular scrutiny and monitoring of transactions.
- **ASM Gold:** İSGOLD supports the sourcing of artisanal and small-scale mined (ASM) gold, provided it complies with the OECD DDG and international standards.

## 8. HEALTH & SAFETY

İSGOLD is committed to providing a safe and healthy working environment for all employees. As an ISO 45001 certified company, we implement the following safety measures:

- Provision of personal protective equipment (PPE);
- Routine training on health and safety protocols;
- Ensuring proper ventilation and safety instructions.

## 9. GOVERNANCE AND COMPLIANCE

İSGOLD upholds the highest standards of governance by ensuring that all employees and business partners adhere to our code of conduct, anti-corruption laws, and international regulations. We enforce compliance through strict disciplinary measures, including termination of employment or contracts when necessary.

The risk mitigation decision-making process is driven by the Responsible Sourcing and Compliance Committee (RSCC), chaired by the CEO and composed of the AMS (Accreditation and Management Systems) Manager, the Legal Compliance Officer, and the Head of Sales. The RSCC is responsible for discussing the risk level determined for

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each counterparty and their supply chains, validating the risk assessment, and considering any grounds for adjustments.

We promote continuous improvement in our management systems, including our ISO 9001 certified quality management system, and require our suppliers to adopt similar systems to ensure compliance with responsible sourcing practices.

## 10. RECORD KEEPING AND TRANSPARENCY

İSGOLD ensures that all records related to the precious metals supply chain are maintained for at least 10 years, or as required by local laws. This documentation demonstrates our commitment to ongoing due diligence and transparency.

## 11. CONTINUOUS IMPROVEMENT

İSGOLD is dedicated to the continuous improvement of its practices across the supply chain. We regularly review our policies to ensure they remain relevant and effective, aligning with evolving international standards.

### Contact Information:

For inquiries or concerns regarding our supply chain policy, please contact us at [compliance@isgold.com](mailto:compliance@isgold.com).

### Policy Acknowledgment:

By signing this document, we acknowledge receipt of İSGOLD Altın Rafinerisi's Supply Chain Policy and commit to compliance in all interactions with the company.

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