

Responsible Gold & Silver Compliance Report 2025

Reporting period: 1 January - 31 December 2025

REPORTING BASIS

OECD Due Diligence Guidance and Gold Supplement • LBMA Responsible Gold Guidance Version 9 • LBMA Responsible Silver Guidance Version 2 • LBMA Disclosure Guidance

İSGOLD Altın Rafinerisi A.Ş.

İkitelli OSB Mah., Marmara Sanayi Sitesi S Blok No:5

Küçükçekmece, İstanbul, Türkiye

T: +90 212 494 48 10 | www.isgold.com

info@isgold.com | compliance@isgold.com

Document control

Item	Information
Report owner	Internal Control and Supply Chain Compliance Department
Management accountable	Erdem Aşık - Chairman of the Board, Chief Executive Officer and General Manager Miray Kuz - Vice Chair of the Board
Reporting period	1 January - 31 December 2025
Metals and feedstock in scope	Recycled gold and recycled silver only; no mined gold, mined silver, mined doré, mining by-product or mixed mined/recycled material accepted
Status	Management Compliance Report - completed management version; independently assured under ISAE 3000 (reasonable assurance)
Version	1.1
Public contact	compliance@isgold.com

Important status clarification

ISGOLD was not an LBMA Gold or Silver Good Delivery List refiner during the reporting period or at the date of this revision. References to LBMA RGG9, RSG2, DG3 and the Responsible Sourcing Programme describe the alignment and assurance criteria used for this report. They do not represent or imply LBMA accreditation, GDL status, or access to the LBMA Gold Bar Integrity (GBI) platform.

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1. Management statement

Responsible sourcing is an integral part of ISGOLD's governance, counterparty acceptance and precious-metals control environment. It is essential to protecting human rights, preventing financial crime, maintaining market integrity and sustaining stakeholder confidence.

For the year ended 31 December 2025, ISGOLD applied a risk-based due diligence management system to recycled gold and silver, designed to align with the OECD five-step framework, LBMA Responsible Gold Guidance Version 9 and Responsible Silver Guidance Version 2. The system covers counterparty onboarding, beneficial ownership, sanctions and adverse-media screening, country and supply-chain risk assessment, enhanced due diligence, transaction monitoring, traceability, escalation, grievance handling and reporting.

ISGOLD's 2025 feedstock consisted entirely of recycled precious metals. No mined gold, mined silver, mined doré, mining by-product or mixed mined/recycled material was accepted. Requirements applying only to mined material are therefore not applicable to the 2025 population.

Management oversight was supported by the Responsible Sourcing and Compliance Committee. Where evidence could not be obtained or risk could not be resolved, relationships or potential direct transactions were suspended pending satisfactory review. No grievance or whistleblowing report relating to the precious-metals supply chain was recorded in 2025.

Based on the system and activities described in this report, management considers that ISGOLD implemented the applicable due diligence framework during 2025. This is a management assertion subject to independent assurance. The signed assurance report should be read together with the final signed Compliance Report.

Erdem Aşık

Chairman of the Board, Chief Executive Officer and General Manager

Date / Signature: 25.08.2026



2. About ISGOLD and reporting scope

2.1 Company and operations

ISGOLD Altın Rafinerisi A.Ş. is a Türkiye-based precious-metals refinery and manufacturer specialising in the refining, production and trading of gold and silver products. It operates an integrated precious-metals processing facility in İstanbul and serves domestic and international customers.

Relevant memberships and management-system certifications include Borsa İstanbul Precious Metals Market membership (member code VAA), Responsible Jewellery Council membership and applicable RJC COP/COC and ISO 9001, ISO 14001, ISO 45001 and ISO 10002 certifications. Scope and validity are supported by the certificates retained in the assurance file.

2.2 Reporting and organisational boundary

This report covers the acceptance, purchase, refining, production, storage, sale and shipment of recycled gold and recycled silver from 1 January to 31 December 2025. The organisational boundary is ISGOLD Altın Rafinerisi A.Ş. and includes the İstanbul central refinery at İkitelli OSB, the Management Office, Marmara Sanayi Branch and Kuyumcukent 2 Branch. Refining and processing are performed within ISGOLD's controlled operations; the offices and branches perform management, commercial, customer and control activities relevant to the common due diligence system. The boundary includes Compliance, Sales, Procurement, Production, Finance, Integrated Management Systems, Legal, branch personnel and senior-management oversight. Current location details are published at <https://isgold.com/iletisim.aspx>.

No separate subsidiary, shared refinery or outsourced refining/processing facility was included in the 2025 reporting boundary.

2.3 Feedstock classification

Material category	2025 applicability
Recycled gold	Applicable - 100% recycled model
Recycled silver	Applicable - 100% recycled model
Mined gold / mined silver	Not applicable - zero accepted
Mined doré / mining by-product	Not applicable - zero accepted
Mixed mined/recycled material	Not applicable - zero accepted

3. Reporting criteria and conformity statement

This report uses the OECD Due Diligence Guidance, LBMA RGG9, LBMA RSG2, relevant LBMA disclosure and third-party assurance expectations, applicable Turkish AML/CFT and Borsa İstanbul requirements, and ISGOLD's approved policies and procedures as reporting criteria.

3.1 Integrated gold and silver report

Gold and silver are addressed in one integrated report because governance, KYC, screening, risk assessment, escalation, traceability, training and grievance controls operate through a common management system. Supplier, transaction, material-category, origin and testing populations remain separately identifiable by metal.

3.2 Management conformity statement

Management considers the activities described in Sections 5-9 to be consistent, in all material respects, with the applicable OECD five-step framework and the alignment criteria stated above. This conclusion is a management assertion, not an LBMA accreditation statement and not a substitute for the independent assurance conclusion.

3.3 Basis of preparation

Principle	Application
Balanced	Controls, risk events, suspensions, limitations and improvement actions are described.
Evidence-based	Statements are supported by policies, KYC/EDD files, screening, minutes, ROTA/MICRO records, training and assurance evidence.
Proportionate	Stakeholder-useful information is disclosed without unnecessarily exposing personal, investigative or commercially sensitive data.
Metal-specific	Gold and silver populations and statistics are separable although shared controls are described once.
Comply or explain	Non-applicable mined-material and GDL-only requirements are explained rather than left silent.

4. 2025 Responsible Sourcing Performance Summary

Performance indicator	2025 status
Feedstock model	100% recycled gold and silver; no mined material, mining by-product or mixed feedstock
OECD five-step framework	Implemented through the management system; subject to assurance testing
LBMA RGG9 / RSG2	Used as alignment criteria; ISGOLD is not a GDL refiner
Counterparty due diligence	Applied before approval and subject to ongoing monitoring
Beneficial ownership / PEP / sanctions / adverse media	Performed using KYC/KYB and LSEG World-Check
Country, origin, transit and CAHRA assessment	Conducted on a risk basis
EDD and site visits	Risk-based; new dealer businesses visited before commencement
Responsible Sourcing and Compliance Committee	Active during 2025
Supply-chain grievances	0 recorded
Independent assurance	Borsa İstanbul assurance separate; LBMA-aligned engagement subject to signed provider conclusion

Quantitative disclosure completion

Period-specific quantitative disclosures and explicit zero results are presented in Section 10.1. The figures have been reconciled with the relevant supplier population, risk and EDD registers, site-visit records, Committee records and training documentation.

5. Step 1 - Establish strong company management systems

5.1 Policy framework

ISGOLD maintains a Precious Metals Supply Chain Policy supported by Customer Acceptance and Risk Assessment, AML/CFT, anti-bribery and corruption, child and forced labour, record retention, grievance and whistleblowing controls. The policy framework addresses OECD Annex II risks, sanctions, PEP, fraudulent origin, money laundering, terrorist financing, human rights, ESG and material-integrity risks.

The Precious Metals Supply Chain Policy was subject to annual management review on 30 December 2025. Following that review and subsequent framework updates, Policy Version 8 was approved/effective on 8 July 2026. The controlled revision history preserves the relationship between the 2025 review and the later update. The public policy page is <https://isgold.com/Kurumsal-Yonetim-Politikalari.aspx>. Policy commitments are communicated to relevant employees and counterparties through training, contractual clauses, declarations and due diligence communications.

5.2 Governance, competence and resources

The Board retains ultimate accountability. The Responsible Sourcing and Compliance Committee provides cross-functional oversight. During 2025, the compliance function comprised two Compliance Officers and one Compliance Specialist. A Compliance Officer deputised whenever the Compliance Manager was unavailable, providing continuity and direct escalation to senior management. Compliance review remained independent from commercial approval. The Board and senior management received responsible-sourcing training/briefing through the 30 December 2025 management review, covering 2025 performance, risk cases, policy and control developments, assurance and improvement actions.

Management assessed three dedicated compliance personnel, deputisation and the available technology as adequate in relation to the 2025 supplier population and risk profile. The programme used LSEG World-Check, ROTA and MICRO; no other screening or workflow system was used during the period. Relevant system access, licences and user roles were maintained under the applicable internal controls.

5.3 Systems, traceability and records

ROTA supports counterparty approval, material receipt, lot status, production, packaging, shipment and document audit trails. MICRO supports accounting, invoices, customer accounts and financial reconciliation. Required due diligence and approval must be complete before normal goods acceptance and processing. Bank transfer is the normal payment method. A small number of exceptional cash-register transactions may occur; these are not automatically prohibited, but are subject to enhanced documentary review, customer/transaction analysis, approval, cash-limit and AML/CFT controls, and reconciliation to the accounting and transaction records.

Responsible-sourcing and transaction records are retained for at least eight years, or longer where required by law or internal policy. Access rights, user changes, audit trails, backups and integrity controls are maintained to protect records against unauthorised access, alteration or destruction.

5.4 Counterparty engagement, training and grievance

Counterparties are required to provide complete and accurate identity, ownership, licensing, expected-volume, source, origin and legitimacy information; notify material changes; accept relevant policy expectations; and cooperate with additional due diligence. Relevant personnel receive role-based training. On 4 June 2025, a one-hour online training session was delivered to 51 of 141 employees (36% of the employee population). The training covered AML/CFT legislation and obligations, customer identification and suspicious-transaction reporting, sanctions/PEP/adverse-media risks, responsible supply-chain requirements and related international standards. The public grievance mechanism is available at <https://isgold.com/ihbar-hatti.aspx>, is open to internal and external stakeholders, supports confidential/anonymous reporting, prohibits retaliation and documents investigation, resolution and communication.

6. Step 2 - Identify and assess risks in the supply chain

6.1 Counterparty due diligence and screening

KYC/KYB is completed before a relationship is established and refreshed periodically and upon triggering events. It includes legal identity, authorised signatories, UBOs and control, business activity, licensing, bank information, expected volumes and evidence supporting source and origin. Counterparties, UBOs and authorised persons are screened through LSEG World-Check and reliable public sources for sanctions, PEP exposure, adverse media and enforcement matters. Potential matches are resolved and documented by Compliance.

6.2 Integrated risk assessment

Risk dimension	Considerations
Location	Origin, transit, establishment, CAHRA, sanctions, FATF, corruption, political instability and human-rights indicators
Counterparty	Identity, UBO/control, PEP, reputation, adverse media, enforcement, business model and capacity
Material	Recycled category, source/ownership evidence, plausibility, intermediaries and refining history
Transaction	Payment method, third-party/cash indicators, unusual structure, value/volume/frequency and account-country inconsistencies

CAHRA and red-flag determinations use current, documented external sources with access dates. For FY2025, the review should include the relevant Dodd-Frank covered countries, EU CAHRA resources and current plus preceding three years of FATF monitoring lists, alongside other sources required by ISGOLD's broader integrated risk methodology.

6.3 Recycled material and enhanced due diligence

Because no mined material was accepted, mine-site due diligence was not applicable. Recycled controls test counterparty legitimacy and capability, source and ownership evidence, material and volume consistency, origin/transit, intermediaries, payment risks and links to theft, fraud, sanctions, money laundering, terrorist financing, human-rights abuses or ESG concerns. In 2025, ISGOLD dealt with one intermediate refinery; it was an LBMA Good Delivery refinery and its status and assurance evidence were verified. No non-assured intermediate refinery was used.

EDD may include additional documents, ownership clarification, source-of-funds/wealth review, expanded media and sanctions checks, route/origin evidence, site visits and Committee/senior-management approval. Five counterparties underwent EDD in 2025. Branch and Sales personnel completed visits to 30 counterparties using risk-based and onboarding controls; no external assessor was used and no material visit finding was identified. There was no high-risk counterparty for which a required visit could not be completed. Visit records identify the counterparty, visitor, date, scope, observations and follow-up.

7. Step 3 - Design and implement a strategy to respond to identified risks

7.1 Escalation and decision-making

Commercial urgency does not override responsible-sourcing controls. Compliance may request information, increase monitoring, hold a transaction or recommend rejection. Material matters are reviewed by the Committee and senior management according to authority levels.

Risk status	Management response
Standard / no material red flags	Approve subject to normal controls and ongoing monitoring.
Elevated but manageable	Apply EDD and define approval and monitoring requirements before proceeding.
Mitigation in progress	Continue only where permitted by policy under a documented, time-bound plan with measurable follow-up, including review after six months where applicable.
Unresolved / unacceptable	Do not onboard, suspend transactions or terminate/disengage; report to authorities where required.
Severe OECD Annex II / sanctions	Immediate suspension or disengagement in accordance with policy and law; escalate to management and authorities as applicable.

7.2 Evidence of operation during 2025

Period	Recorded action / decision
February	Training and internal-audit reporting obligations reviewed.
March	Compliance reporting, conference participation and Borsa İstanbul assurance engagement considered.
April-July	Periodic statistics, staff training, RJC developments and policy/KYC review addressed.
September	Relationship proposed for suspension because requested evidence remained incomplete; reassessment conditioned on receipt and verification.
October	EDD and public-enforcement event reviewed; specified potential direct transactions temporarily frozen pending developments.
November	Further AML-related enforcement event reviewed; potential direct dealings with the relevant person and related firms suspended.
December	RJC audit outcomes and annual management review preparation considered.

Full names, screening, EDD, decisions and closure evidence are retained for assurance and legal review. Of 31 supplying counterparties, 10 were newly approved, 3 were classified as high risk and 5 underwent EDD. Zero zero-tolerance cases, zero red flags and zero identity/origin/traceability incidents were recorded. Of the three high-risk counterparties, two continued under enhanced monitoring and documented risk controls, while one was suspended. Across the full population, transactions with two firms were suspended during 2025; no relationship was terminated. The monitored cases are subject to periodic review, including a six-month follow-up where applicable. No responsible-sourcing risk notification to a competent authority or industry body was required during 2025.

8. Step 4 - Independent third-party assurance

8.1 Assurance status

ISGOLD's 2025 responsible supply-chain activities were independently assured by PKF Aday Bağımsız Denetim A.Ş. under ISAE 3000 at a reasonable assurance level. The engagement covered the management assertion and the applicable responsible-sourcing controls and disclosures described in this report. ISGOLD uses LBMA RGG9/RSG2 and DG3 as alignment criteria; the assurance does not imply LBMA GDL accreditation.

8.2 Provider selection and independence

PKF Aday Bağımsız Denetim A.Ş. was selected based on competence, relevant assurance experience, independence, absence of conflicts and engagement capacity. The Board/senior management oversaw appointment and independence. Management remained responsible for this report and supporting evidence; PKF Aday remained responsible for acceptance, planning, risk assessment, testing and its reasonable assurance conclusion under ISAE 3000.

8.3 Findings and corrective actions

Required disclosure	2025 result
Current-cycle high/medium-risk non-conformances	None. No high- or medium-risk non-conformance was reported.
Open high/medium-risk findings from prior cycle	None. No prior-cycle high- or medium-risk finding remained open.
Overall conformity where findings exist	Not applicable; no reportable non-conformance was identified.
Public assurance location	https://isgold.com/Sorumlu-Altin-Tedarik-Zinciri.aspx

8.4 Evidence and retention

Evidence includes approved policies and revisions, organisation and roles, Committee and management-review records, KYC/EDD and site visits, World-Check and match resolution, ROTA/MICRO transactions and reconciliation, suspension/mitigation records, training, grievance register, operational statistics and country-of-origin data. Records are retained for at least five years and made available subject to confidentiality and data-protection controls.

9. Step 5 - Public reporting and ongoing disclosure

9.1 Public disclosures and publication governance

ISGOLD publishes responsible-sourcing policies at <https://isgold.com/Kurumsal-Yonetim-Politikalari.aspx>, its whistleblowing channel at <https://isgold.com/ihbar-hatti.aspx>, and annual Compliance Reports and signed independent assurance reports at <https://isgold.com/Sorumlu-Altin-Tedarik-Zinciri.aspx>. Publication dates, archived versions and material corrections are controlled and retained.

9.2 Country-of-origin reporting

Country-of-origin information is compiled from transaction and lot records and reconciled to the E-09 statistics workbook, ROTA, MICRO, production and stock records. For recycled material, origin means the point at which material is returned to the refiner or another downstream intermediate processor/recycler; a trader's country of incorporation is not automatically material origin.

Because ISGOLD is not a GDL refiner, it has no obligation or access to upload a Country of Origin CSV to the LBMA GBI platform. Gold and silver country-of-origin files are nevertheless maintained separately and provided confidentially to the assurance provider and competent authorities where required.

9.3 Grievance and ongoing disclosure

Stakeholders may use the public whistleblowing route or compliance@isgold.com. Cases are logged, investigated, escalated and closed; outcomes are communicated subject to confidentiality. No relevant grievance was recorded in 2025.

ISGOLD monitors responsible-sourcing allegations and material adverse media. Credible allegations are assessed promptly, and the Company determines whether stakeholder communication, a website update or a public statement is required. Communications are updated as material facts or mitigation status change, rather than waiting solely for the annual cycle.

No responsible-sourcing allegation requiring a press release or specific website update was identified during 2025.

10. 2025 performance and continuous improvement

10.1 Quantitative disclosure and reconciliation

The following 2025 figures were reconciled to supplier populations, risk/EDD registers, Committee records, visit records and signed training records. Supplier metrics are presented on a combined gold-and-silver counterparty basis because the same legal entity may supply both metals; metal-specific transaction and origin populations remain separately identifiable in E-09, ROTA and MICRO.

Metric	2025 result	Rate / coverage	Explanation
Recycled throughput (kg fine)	Reconciled in E-09	Not publicly stated	Gold and silver quantities remain separately identifiable and were provided to the assurance provider.
Supplying counterparties	31	100%	Unique legal entities across gold and silver; overlaps counted once.
Standard-risk suppliers	28	90.3%	31 total less 3 high-risk counterparties.
Elevated/high-risk suppliers	3	9.7%	Two continued under enhanced monitoring; one was suspended.
Zero-tolerance/unacceptable cases	0	0%	No zero-tolerance risk was identified.
EDD / red-flag cases	5 EDD / 0 red flags	16.1% EDD	EDD population reconciled to five counterparty files.
Supplier site visits	30	96.8%	Performed by Branch and Sales personnel; external-assessor proportion 0%; no material finding.
Mitigation plans / monitored high-risk cases	2	6.5%	Continued under enhanced monitoring; six-month follow-up applies where relevant.
Relationships / transactions suspended	2	6.5%	One of the three high-risk counterparties was suspended; total suspended-firm population was two.
Relationships declined/terminated	0	0%	No relationship was terminated during 2025.
Responsible-sourcing grievances	0	0%	No relevant grievance was recorded.
Identity/origin/traceability incidents	0	0%	No material identity, origin, lot or traceability discrepancy was recorded.

10.2 Training and process integrity

Metric	2025 result
Employee population	141
Employees trained	51
Training coverage	36%
Training date and duration	4 June 2025; one hour; online
Board / senior-management briefing	30 December 2025 management review
Material due-diligence process violations	0
Internal sanctions for due-diligence failures	0

10.3 Improvement priorities

- Automate and document ROTA-MICRO-statistics reconciliation with review sign-off.
- Standardise origin, transit, material category and recycled-source evidence at lot level.
- Retain consistent screening parameters, match-resolution rationale and periodic re-screening.
- Use standard site-visit records linked to counterparty risks and follow-up actions.
- Maintain Committee/action trackers with owner, due date, closure evidence and escalation.
- Preserve metal-specific supplier, transaction, origin, risk and assurance testing trails.

11. Conclusion

ISGOLD operated a common responsible-sourcing management system for recycled gold and silver during 2025. It combines policy commitments, senior accountability, KYC and beneficial ownership, screening, location and supply-chain risk assessment, EDD, Committee oversight, transaction monitoring, site visits, ROTA-supported traceability, MICRO financial records, training, grievance handling and public reporting.

Committee records demonstrate that the framework was used to review risk events and suspend relationships or potential direct dealings where evidence was incomplete or concerns required further review. No precious-metals supply-chain grievance was recorded during the period.

Management considers that the programme addresses the applicable OECD five-step and LBMA RGG9/RSG2 alignment criteria for 2025. Independent assurance provides the external conclusion on this assertion. ISGOLD's use of LBMA criteria does not represent LBMA GDL accreditation.

The completed disclosures, direct public URLs, reasonable assurance conclusion, zero-result statements and applicability determinations are supported by the referenced evidence set and management records.

Appendix A - Policy and control framework

Document/control	Purpose
Precious Metals Supply Chain Policy	OECD/LBMA commitments, risk appetite, refusal and escalation
Customer Acceptance and Risk Assessment Procedure	KYC, country/counterparty/material/transaction risk, ongoing review, EDD and approvals
AML/CFT Policy	Financial-crime prevention and statutory reporting
Anti-Bribery and Corruption Policy	Bribery, corruption, improper gifts and conflicts
Child and Forced Labour Policy	Human-rights commitments and counterparty expectations
Grievance and Whistleblowing Policy	Accessible reporting, investigation, non-retaliation and remediation
ROTA ERP / MICRO	Operational and financial traceability
LSEG World-Check	Sanctions, PEP and adverse-media screening
Committee and management-review records	Oversight, EDD, suspension, training, reporting and action closure

The controlled document register identifies owner, version, approval authority, effective date, annual review date and revision history. The Precious Metals Supply Chain Policy was reviewed on 30 December 2025 and updated as Version 8 on 8 July 2026. The 2025 policy set, review evidence, subsequent revision and communication records are retained in the assurance file.

Appendix B - OECD/LBMA implementation summary

OECD step	ISGOLD implementation
Step 1	Policies, senior accountability, Committee, KYC engagement, ROTA/MICRO, training, grievance and five-year records
Step 2	KYC/UBO/PEP, country and CAHRA, World-Check, transaction/material/origin review and EDD
Step 3	Escalation, information requests, holds, mitigation, six-month follow-up, suspension/disengagement and decisions
Step 4	Independent assurance, provider independence, evidence access, findings and corrective actions
Step 5	Annual integrated report, signed assurance, policy/grievance access, origin reconciliation and ongoing disclosure

Minimum risk coverage

- OECD Annex II serious abuses and conflict financing
- Money laundering and terrorist financing
- Bribery, corruption and fraudulent origin
- Sanctions, PEP and adverse media
- ESG and responsible-business risks
- Recycled-material integrity and traceability

Appendix C - Basis of operational statistics

Information is derived from ISGOLD's internal records, management systems and supporting documents and is subject to reconciliation and independent assurance.

Ref.	Evidence
E-01	Approved 2025 policy set, Board approval and revision history
E-02	Organisation, role descriptions, competence, resources and management approval
E-03	2025 Committee and management-review minutes with action closures
E-04	KYC/EDD files and dealer site-visit records
E-05	World-Check screening, parameters and match-resolution samples
E-06	ROTA/MICRO transaction, lot, production, shipment and reconciliation samples
E-07	Training plan, materials, invitations and signed attendance
E-08	Grievance register, channel test and zero-case evidence
E-09	Operational statistics, supplier/risk/metal/category/origin data and reconciliation
E-10	Borsa İstanbul assurance and LBMA-aligned assurance deliverables

Management approval

This report is submitted for management approval together with the reconciled disclosure evidence and the independent reasonable assurance report.

Prepared/reviewed by	Approved by
Compliance Department Date: 25.08.2026	Erdem Aşık Chairman of the Board Date/Signature: 25.08.2026

Corporate and compliance contact

ISGOLD Altın Rafinerisi A.Ş.
İkitelli OSB Mah., Marmara Sanayi Sitesi S Blok No:5
Küçükçekmece, İstanbul, Türkiye
+90 212 494 48 10 | www.isgold.com | info@isgold.com | compliance@isgold.com