

1. FOREWORD

ISGOLD 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.

ISGOLD 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.

ISGOLD does not engage in any activities that may contribute to the financing of conflict and complies with relevant United Nations sanctions resolutions and the national legislation implementing them. This Policy is communicated to suppliers and made publicly available; where applicable, it is incorporated into supplier contracts and/or agreements.

2. SCOPE

This Policy applies to all precious metals handled by ISGOLD and all business partners, including miners, mining companies, scrap dealers, refiners, metal traders, intermediaries, carriers, and service providers. ISGOLD's supply chain due diligence framework ensures that all sourced precious metals originate from legitimate and 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), the LBMA Responsible Sourcing Program, and the ISGOLD Due Diligence Manual. The Compliance Officer has the authority to reject any new business relationship deemed 'high risk' or suspend an existing business relationship. 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.

3. OUR COMMITMENT

ISGOLD is committed to conducting all sourcing activities in an ethical and responsible manner and to not contributing to risks associated with conflict, human rights abuses, illegal activities, or high-risk areas. This Policy covers the minimum risk scope set out in Annex II of the OECD DDG.

3.1 Policy, Due Diligence and Communication:

- The OECD DDG and Gold Supplementary Guidance, the LBMA Responsible Gold Guidance, the LBMA Responsible Silver Guidance, the RJC Standard, the Borsa İstanbul Responsible Precious Metals Supply Chain Guidance, and applicable legislation are integrated into supply chain practices.

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Integrated Management Systems Representative	Internal Control and Supply Chain Compliance Officer	Board of Directors

- The Policy is published on the official website, communicated to suppliers, and incorporated into contracts to the extent applicable.
- Suppliers implement their own risk-based due diligence systems, provide accurate and up-to-date information, and provide evidence of responsible sourcing.
- Regular risk assessments, monitoring, and independent audits are conducted at all levels of the supply chain, and the Policy and related practices are continuously improved.

3.2 Zero Tolerance for Serious Human Rights Abuses

ISGOLD does not tolerate, under any circumstances, the following acts in the course of sourcing from conflict-affected or high-risk areas and does not profit from, contribute to, assist, or facilitate such acts:

- Torture and cruel, inhuman, or degrading treatment;
- Forced or compulsory labour;
- The worst forms of child labour as defined under ILO Convention No. 182;
- Human trafficking, widespread sexual violence, and other serious human rights abuses;
- War crimes, other serious violations of international humanitarian law, crimes against humanity, or genocide.

Where a reasonable risk is identified that an upstream supplier has committed serious human rights abuses, sources from any party committing such abuses, or is linked to such a party, the business relationship shall be immediately suspended or terminated.

3.3 Public or Private Security Forces

ISGOLD is committed to eliminating direct or indirect support to public or private security forces that illegally control mining sites, transportation routes, trading points, or upstream actors, or that illegally impose taxes or extort money or metals.

The role of public or private security forces should be limited to maintaining the rule of law, protecting human rights, ensuring the security of workers, equipment, and facilities, and safeguarding legitimate extraction and trade.

Where ISGOLD or any party in its supply chain engages security services, it shall act in accordance with the Voluntary Principles on Security and Human Rights. Risk-based screening shall be conducted to ensure that individuals or units known to be responsible for serious human rights abuses are not engaged.

ISGOLD supports, where appropriate, cooperation with relevant central and local authorities, international organizations, and civil society organizations to promote transparency, proportionality, and accountability in payments made to public security forces.

Particularly in ASM-related supply chains, ISGOLD shall, where appropriate, work with relevant authorities, international organizations, and civil society organizations to prevent or mitigate the exposure of vulnerable groups to adverse impacts arising from the presence of public or private security forces.

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3.4 Bribery, Corruption and Misrepresentation of Source

ISGOLD does not offer, promise, give, or solicit any bribe and opposes demands for bribes. Any payment, offer, or request intended to conceal or misrepresent the source or origin of precious metals, chain of custody information, or taxes, fees, and royalties paid to governments shall not be accepted.

3.5 Tax, Fee and Royalty Payments

ISGOLD ensures that all taxes, fees, and royalties related to precious metal extraction, trade, and export activities associated with conflict-affected and high-risk areas are paid to the relevant governments or, in accordance with its position in the supply chain, verifies such payments. To the extent applicable, ISGOLD supports the disclosure of such payments in accordance with the principles of the Extractive Industries Transparency Initiative (EITI).

3.6 Environmental and Social Management

ISGOLD 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

ISGOLD 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:** ISGOLD 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 LAUNDERING (AML) & COUNTERING THE FINANCING OF TERRORISM (CFT)

ISGOLD complies with national and international requirements for the prevention of money laundering and terrorist financing within the precious metals supply chain. Applicable laws and regulations, including the obligations established by the Financial Crimes Investigation Board (MASAK), are implemented, and suspicious transactions are reported to the competent authorities without delay.

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Risk-based controls are implemented to identify money laundering risks arising from precious metal extraction, trade, handling, transportation, or export activities associated with illegal taxation or extortion, and to contribute to their effective elimination.

6. NON-STATE ARMED GROUPS

GOLD does not purchase metals from, make payments to, or provide logistical assistance, equipment, or any other direct or indirect support to non-state armed groups through the extraction, transportation, trade, handling, or export of precious metals. There is zero tolerance for groups engaged in any of the following activities:

- Illegally controlling mining sites, transportation routes, points where metals are traded, or upstream supply chain actors;
- Illegally imposing taxes or demanding extortion in money or metals at access points to mining sites, along transportation routes, or at trading points;
- Illegally imposing taxes or demanding extortion from intermediaries, exporters, or international metal traders.

Where a reasonable risk is identified that an upstream supplier sources from or is linked to a party that directly or indirectly supports non-state armed groups, the business relationship shall be immediately suspended or terminated.

7. PRECIOUS METALS SOURCING PROCESS

- **Know Your Customer (KYC):** A comprehensive, risk-based KYC process is conducted before entering into any business relationship; information is regularly updated and monitored.
- **Source and Traceability:** The source, origin, weight, purity, supplier, transportation, and transaction details of each lot are recorded; processing does not continue until discrepancies are resolved.
- **CAHRA and Enhanced Due Diligence:** Enhanced due diligence is applied to relationships involving source, transit, supplier, or transaction red flags.
- **ASM Gold:** ASM gold sourcing is considered only where it complies with the OECD DDG, LBMA requirements, applicable legislation, and ISGOLD's risk appetite.
- **Third-Party Payments:** It is verified that the paying party, invoicing party, owner of the metal, and shipping party correspond; unexplained third-party transactions are not accepted.

8. HEALTH & SAFETY

ISGOLD 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.

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9. MANAGEMENT, RISK MITIGATION AND COMPLIANCE

Supply chain risks are assessed by the Responsible Sourcing and Compliance Committee, chaired by the Compliance Officer. The Committee reviews the risk level, whether to initiate or continue the business relationship, the risk mitigation plan, and decisions regarding suspension or termination; where necessary, decisions are submitted to senior management.

Where a reasonable risk of illegal support to public or private security forces is identified, a risk management plan containing measurable objectives shall be promptly developed and implemented with the relevant upstream suppliers and stakeholders. If significant and measurable improvement is not achieved within six months from the approval of the plan, the relationship with the supplier shall be suspended for a minimum period of three months or terminated. In the event of suspension, the relationship shall not be resumed until a revised risk management plan and a reassessment of the risks have been completed.

For risks related to bribery, misrepresentation of source or origin, money laundering, and tax, fee, or royalty risks, a risk mitigation plan containing measurable objectives and reasonable timeframes shall be implemented with suppliers, relevant public authorities, international organizations, civil society, and affected parties. If significant and measurable improvement is not achieved within six months, the business relationship shall be suspended for a minimum period of three months or terminated; resumption of the relationship shall be subject to a revised plan and reassessment of the risks.

No risk mitigation approach shall be pursued for risks of serious human rights abuses or direct or indirect support to non-state armed groups; the business relationship shall be immediately suspended or terminated.

10. RECORD KEEPING, TRANSPARENCY AND GRIEVANCE MECHANISM

All records relating to the precious metals supply chain shall be retained for at least 10 years or for any longer period required by applicable legislation. ISGOLD supports annual reporting on responsible sourcing practices and relevant independent assurance processes.

Employees, suppliers, customers, and other stakeholders may confidentially submit their questions, complaints, or concerns regarding the supply chain to compliance@isgold.com. No retaliation shall be taken against individuals who make reports in good faith. Reports shall be recorded, assessed, and appropriate corrective actions shall be monitored.

11. CONTINUOUS IMPROVEMENT AND POLICY APPROVAL

ISGOLD regularly reviews its supply chain practices and updates its policies and procedures in line with international standards, applicable legislation, audit findings, and changing risks. Periodic training is provided to employees and relevant business partners.

This Policy shall enter into force upon approval by the Board of Directors. ISGOLD employees and business partners are required to comply with the provisions applicable to them.

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