

Grievances and Whistleblowing Policy

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1. GUIDING PRINCIPLES

ISGOLD ALTIN RAFİNERİ A.Ş. ("ISGOLD") is an internationally recognized leader in the precious metals supply chain, committed to operating with the highest levels of integrity, transparency, and responsibility. This policy underscores ISGOLD's dedication to promoting a corporate culture where stakeholders can confidently raise concerns, ensuring that all grievances are addressed equitably and with integrity.

The company's guiding principles for the Grievances and Whistleblowing Policy are aligned with international standards, including the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains. This policy supports ISGOLD's commitment to the continuous improvement of ethical practices, responsible sourcing, and transparent operations.

Key Principles:

- **Legitimacy:** ISGOLD ensures that grievances and whistleblowing mechanisms are trusted, transparent, and accessible to all stakeholders.
 - **Accessibility:** The mechanisms for submitting grievances are designed to be clear and easy to use for both internal and external parties.
 - **Fairness and Objectivity:** All complaints will be thoroughly investigated, based on reliable evidence, and evaluated in a neutral and impartial manner.
 - **Rights-Compatible Processes:** ISGOLD ensures that its grievance mechanism is aligned with human rights obligations, fostering a system that is just and inclusive for all stakeholders.
 - **Protection from Retaliation:** ISGOLD takes necessary steps to protect whistleblowers and complainants from retaliation, discrimination, or adverse consequences, except where legal compliance or disciplinary rules are involved.
 - **Continuous Improvement:** The company commits to improving its grievance and whistleblowing processes through regular reviews and updates, ensuring alignment with best practices and international standards.
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2. PURPOSE

The primary purpose of this Grievances and Whistleblowing Policy is to establish a transparent and structured framework through which internal and external stakeholders can raise grievances related to ISGOLD's operations and the precious metals supply chain. This policy encourages proactive reporting of any potential or identified risks, unethical behavior, or misconduct. By fostering open communication, the company aims to build trust and mutual respect among its employees, contractors, customers, suppliers, and other stakeholders.

This policy serves to:

- **Provide clarity** on how grievances should be reported and how they will be handled.
 - **Ensure anonymity** for those who fear retaliation or wish to protect their privacy.
 - **Foster a culture of responsibility** where employees and stakeholders feel empowered to report any misconduct or irregularity.
 - **Improve ethical standards** and safeguard the integrity of ISGOLD's business practices.
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3. SCOPE

This policy applies to all grievances or whistleblowing complaints raised by any internal or external stakeholders. This includes, but is not limited to, ISGOLD employees, contractors, suppliers, customers, civil society groups, NGOs, and community members impacted by the company's activities. The scope of grievances that can be addressed under this policy includes:

- **Human rights violations:** Allegations of discrimination, harassment, forced labor, child labor, or other violations of human rights.
- **Health and safety issues:** Concerns related to unsafe working conditions or negligence in ensuring the health and safety of employees, contractors, or communities.
- **Environmental risks:** Activities that pose risks to the environment, including pollution, deforestation, water contamination, or unsustainable resource usage.
- **Corruption and bribery:** Allegations of corrupt practices, bribery, or unethical conduct within the company or its supply chain.
- **Money laundering and terrorism financing:** Concerns related to financial irregularities, money laundering, or involvement in financing terrorism.
- **Supply chain issues:** Complaints about unethical sourcing of precious metals, particularly in conflict-affected and high-risk areas.
- **Compliance and legal matters:** Allegations of non-compliance with legal or regulatory requirements, as well as ISGOLD's internal policies and codes of conduct.
- **Other ethical violations:** Any behavior or actions that violate ISGOLD's principles of integrity, fairness, and transparency.

Grievances that fall outside the scope of this policy include:

- **Unsubstantiated or frivolous complaints:** Grievances that are made without any supporting evidence, made in bad faith, or made with malicious intent.
 - **Business decisions:** Disputes related to business and financial decisions that do not involve illegality or misconduct.
 - **Personal grievances:** Personal issues such as career-related complaints or interpersonal conflicts that are not tied to the company's legal, ethical, or regulatory obligations.
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4. DEFINITIONS

- **Grievance:** A formal expression of dissatisfaction or concern raised by an individual or group related to ISGOLD's operations, activities, or supply chain. This may involve more serious issues such as corruption, human rights abuses, or unethical behavior.
 - **Whistleblower:** Any individual who reports misconduct, unethical behavior, or illegal activities within the company or its supply chain. Whistleblowers may be employees, contractors, suppliers, customers, or third parties, and they are protected from retaliation under this policy.
 - **Interested Parties:** Includes all individuals or groups that may be impacted by ISGOLD's operations, including employees, communities, customers, contractors, suppliers, NGOs, and other stakeholders.
 - **Grievance Procedure:** The formal process that stakeholders can use to raise concerns about ISGOLD's operations, particularly in cases of human rights violations, environmental risks, or unethical behavior.
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5. REGULATORY FRAMEWORK

This policy is built upon key international guidelines and standards that define ethical and responsible business practices. These include:

- **United Nations Guiding Principles on Business and Human Rights:** A framework for ensuring that companies respect human rights and avoid causing or contributing to human rights abuses.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:** Provides a framework for ensuring responsible sourcing of minerals in line with international best practices, particularly in high-risk areas.
- **Responsible Jewellery Council Chain-of-Custody Standard:** Establishes requirements for traceability and responsible production in the jewelry supply chain.
- **London Bullion Market Association (LBMA) Responsible Gold and Silver Guidance:** Provides standards for the responsible sourcing of gold and silver, ensuring compliance with anti-money laundering, conflict-free sourcing, and ethical business practices.

Internally, this policy is also aligned with ISGOLD's core documents:

- **Code of Conduct**
 - **Compliance and Ethics Policy**
 - **Human Rights Policy**
 - **Supply Chain Due Diligence Policy**
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6. GRIEVANCE PROCEDURE

6.1 Submission of Grievances

ISGOLD encourages stakeholders to submit grievances through secure and confidential channels, ensuring that all reports are handled with the utmost confidentiality. Grievances can be submitted via:

- **Online:** Through ISGOLD's SpeakUp platform (globally accessible) at <https://isgold.com.tr/hotline>
- **Email:** Directly to compliance@isgold.com
- **Telephone:** +90 212 494 48 10
- **In person:** To ISGOLD's Compliance Officer at their office in İkitelli, Istanbul

6.2 Anonymous Reporting and Whistleblower Protections

Whistleblowers can submit grievances anonymously, ensuring their identities are protected throughout the process. While providing contact information is encouraged to facilitate communication, it is not mandatory. ISGOLD guarantees that all whistleblower identities will be protected unless disclosure is legally required. Whistleblowers will not face retaliation for submitting grievances in good faith, regardless of the outcome of the investigation.

6.3 Information to be Provided

When submitting a grievance, stakeholders should provide as much information as possible to enable a thorough investigation. This should include:

- **Full name of the Grievant** (if not anonymous)
- **Contact details of the Grievant** (if not anonymous)
- **A detailed description of the incident**, including the nature of the concern, relevant dates, locations, and any evidence or witnesses.
- **Supporting evidence**, such as documents, photographs, or other relevant materials that can substantiate the claim.

6.4 Processing of Grievances

Upon receiving a grievance, ISGOLD will acknowledge receipt and assess the validity of the claim. The company will launch an investigation based on the evidence provided and will involve relevant departments in the investigation process.

- **Timeline:** ISGOLD aims to provide an initial response within two weeks of receiving a grievance, indicating the expected timeframe for resolving the issue.
- **Investigation:** ISGOLD will conduct a thorough investigation, ensuring that all relevant evidence is considered.
- **Communication:** The outcome of the investigation will be communicated to non-anonymous grievants, and any corrective actions will be implemented as necessary.
- **Confidentiality:** All grievances, investigations, and outcomes will be handled confidentially, ensuring that privacy regulations are strictly followed.

7. INCIDENT REPORT GUIDANCE

ISGOLD encourages all stakeholders, including civil society groups, NGOs, and other third parties, to provide comprehensive information when reporting grievances. This may include:

- **Research methodology:** Detailing the process used to gather evidence, including interviews and field research.
- **Diverse sources:** Incorporating information from a range of stakeholders to ensure the accuracy and reliability of the report.

- **Victim perspectives:** Including firsthand accounts from affected individuals or communities, while ensuring their protection and confidentiality.
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8. EXTERNAL REFERENCES

This policy is based on best practices and international standards, including:

- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and the Supplement on Gold, third edition 2016**
- **UN Guiding Principles on Business and Human Rights, 2011**
- **LBMA Responsible Gold Guidance, v9 November 2021**
- **LBMA Responsible Silver Guidance, v2 November 2023**
- **Responsible Jewellery Council – Code of Practice Standards Guidance, 2019**
- **Responsible Jewellery Council – Chain of Custody Standards Guidance, 2017**
- **The World Gold Council Conflict Free Gold Standard, 2012**
- **The Conflict-Free Sourcing Initiative: Five Practical Steps for Conflict Minerals Due Diligence and SEC Disclosure, version 3.0 April 2017**
- **BIST Responsible Sourcing Guidance, March 2021**

Through this policy, ISGOLD reaffirms its commitment to ethical practices, corporate responsibility, and transparency across its global operations.