

Information Security Policy

V04

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1. Purpose

With this Plan, ISGOLD Altın Rafinerisi A.Ş.'s conditions and methods of fulfilling its obligations to regulatory institutions, customers, third parties and personnel in emergency and unexpected situations, measures and measures to be taken to fulfill any requests and expectations that may be encountered. It is to determine the measures and actions to be taken to ensure fast and healthy communication with the plans.

2. Scope

The emergency and contingency plan includes measures for the protection of assets and procedures for the evaluation of damaged assets, prepared in parallel with the Company's quality management system policies and procedures and taking into account all the resources that the company may need to continue its activities. Inc. It covers the processes related to the transactions that the employees will take within the framework of the prepared plan.

3. Definitions

Company : ISGOLD Altın Rafinerisi A.Ş.

Board of Directors: The Company's Board of Directors,

General Manager : Company General Manager

Unit: All existing or future units in the organizational structure of the company

Business Continuity Policy: Effective measures can be taken in case of disaster, crisis or interruption; The holistic management process, which includes policies, standards and procedures, including the determination of potential risks, to ensure the continuity of the operations determined for the purpose of protecting the reputation, brand value, value-adding activities and the interests of the stakeholders, or to ensure that they can be recovered within the targeted time frame and to return to the pre-crisis situation,

Interruption: The continuity of the Company's activities or the functions of a system is interrupted by force majeure other than planned transitions,

Disaster: An event caused by human, nature or other factors that may cause long-term interruption in activities or systems,

Emergency Situation: Even if foreseen in advance, the place and time of its occurrence is unknown, if it occurs, it causes losses and business interruption and requires the implementation of plans and procedures,

Business Impact Analysis: The analysis process of business processes and the effects that an activity interruption may have on business processes,

Information Systems Continuity Plan: The plan, which is a part of the business continuity plan, prepared to ensure the continuity of the information systems services that ensure the continuity of the activities, in case of an interruption.

Emergency and Unexpected Situation Plan: The plan, which is a part of the business continuity plan, in which the measures to be taken and the priority actions to be taken in order to manage risks and problems in a situation that is likely to cause a sudden and unplanned interruption in activities, job loss or crisis,

Scenario: Scenarios that include a possible information systems outage or emergency event and the recovery strategies to be followed before, during and after the outage/event related to the said interruption/incident,

Crisis Center: It refers to the physical environment created under the responsibility of the Secretariat, where the works are managed and coordinated in order to combat the emergency.

4. Responsibilites

The General Manager is responsible for determining the implementation principles of this Plan and its implementation, following the legal changes and accordingly making the necessary changes in this plan, and all company employees are responsible for the implementation of the plan.

5. Business Continuity Plan

URGENT ACTION: It includes the emergency measures to be taken for the safety of employees, physical environment and infrastructure in the first minutes and hours following the events that prevent the company from continuing its normal operation.

CRISIS MANAGEMENT: Interruption of the main activities of the company and/or events with corporate impact are considered as “crisis”. The crisis is managed with a strategic perspective with the participation of the top management and crisis team.

JOB RESCUE: It is the activity of recovering the products, processes and services that will cause significant damage in terms of financial, customer relations, legal obligations and image due to the interruption of the normal operational activities of the company during emergency actions and crisis management.

In an emergency, the Company faces five basic dangers;

- Loss of communication and telecommunication facilities
- Loss of information processing capacity and possibilities
- Loss of access to infrastructure
- Loss of trained human resources
- Loss of assets

The purpose of emergency/contingency planning are;

- Preventing disasters: identifying risks and taking preventive measures,
- Organized response: quick and accurate response to disaster by being prepared and trained,
- Protecting assets and cash flow: identifying options and alternative procedures,
- Rehabilitation of the infrastructure was determined as a return to normal operations.

In the Emergency / Unexpected Situation Action Plan, utmost importance is given to the safety of the personnel, and an emergency organization is established to deal with the emerging problem or crisis.

The plan has been prepared by evaluating the degree of impact of a possible emergency and unexpected situation on the company's operations. In case of unexpected adverse events in the company's business processes, It is aimed to have a risk-based, functional business continuity plan focused on critical business processes

- in order to protect our assets in the best way possible in unexpected situations.
- To ensure continuity in our customer services,
- To fulfill our responsibilities towards legal and third parties on time,
- Reducing the effects of disasters on our financial situation by not causing complexity / interruption in our workflows,
- To minimize the losses of our personnel and customers in the event of a disaster,

5. BUSINESS CONTINUITY POLICY

İSGOLD Gold Refinery A.Ş. 's policy is to continue to meet the needs of customers even under the most adverse conditions. In this context, it is aimed to carry out operations and services by giving the highest value to the safety of employees, the health of the public and employees, the protection of the environment and property. In addition, with the successful implementation of the Plan, it is aimed to ensure the welfare of customers and employees and to protect their interests.

The strategy to follow after an incident includes the following elements:

- Protecting personnel and dealing with bodily casualties;
- Assessing the extent of the incident;
- Controlling the threat;
- Evaluate emerging problems and their consequences;

- Activate ad-hoc operations as quickly as possible;
- Managing internal and external communications.

7. THREATS AND SCENARIOS

Threats such as fire, earthquake, flood, blizzard, system interruption, infrastructure collapse, terrorist attacks that may cause interruption of services and responsibilities towards customers, commercial counterparties and legal and regulatory authorities, “Protection and Security Plans” prepared on the basis of scenarios were prepared. These plans were made into a company directive and presented to the information of all personnel, Crisis Management, Emergency Action and Business Rescue teams were formed and assigned to these team members as emergency duties.

Crisis Management Team:

General manager

Production manager

General coordinator

Emergency Action Team:

Process Engineer

Human resources specialist

Responsible for information processing

Business Recovery Team:

Accounting Specialist

Administrative affairs manager

IT officer

8. BUSINESS RECOVERY STRATEGY

a. Operational Risk Assessment

İSGOLD Gold Refinery A.Ş. In case of interruption of all services and other activities of

- Financial
- Legal Obligations
- Customer Relationships
- Reputation/image

The effects and losses of the company were determined as a result of the Business Impact Analysis conducted with all business units, and the importance levels, critical periods and recovery periods of all the activities of the company were determined, and detailed business recovery plans were prepared for the recovery of critical processes.

b. Alternative location: Alternative locations for non-production activities are the branches of Kuyumcukent and Grand Bazaar, which are affiliated with the Company.

c. Retention of Records

Financial statements and all kinds of records and negotiable documents that are obliged to keep in accordance with the current legislation are kept in the Archive in the Accounting Department for a period determined within the framework of the legal legislation, in print and / or electronically. Customer contracts, identity information and other documents that are required to be taken at account opening are kept in closed cabinets, contracts and annexes related to closed accounts are sent to the archive to be kept until the end of the legal retention period. All kinds of customer information and accounting records of the programs used as operation and accounting software are stored in the system in a way that can be accessed for a minimum of 10 years. The current software used is generally accepted in the industry, suitable for risk management and flexible reporting. No system-related risk is foreseen due to continuous backups.

9. CONTACT

Crisis Management Team, Emergency Action Team and Business Rescue Team have been formed to coordinate the entire operation in case of Emergency and Unexpected. In these teams, the company's senior managers and necessary business unit personnel. The applications to be carried out by the teams in case of an Emergency are determined in the "Emergency communication table" according to the type of Emergency. Informing customers and providing communication in case of interruption of Business Continuity and commissioning of business continuity plans, www.isgold.com. via SMS or e-mail to all customers centrally, or by means of press releases. The General Manager and the General Coordinator have been appointed as responsible for establishing contact with all official institutions such as the Ministry of Treasury and Finance, Borsa İstanbul and MASAK. It will be finalized within the period of routine notifications, according to the instructions of the Business Recovery Team manager, by the people in the Business Rescue Teams. The main center where mandatory notifications will be made; The address is İkitelli OSB Mahallesi Marmara Sanayi Sitesi S Blok No:5 Küçükçekmece /İstanbul.

10. EFFECTS OF THE EMERGENCY TO THE OPPONENT PARTY AND TERMINATION OF ACTIVITIES

However, in case of failure to communicate with customers or to fulfill customer orders due to an emergency and unexpected situation, the services provided to customers may be interrupted. İSGOLD Gold Refinery A.Ş. business continuity plan, the continuation of the company's activities with minimum interruption and damage in case of emergency; to continue to meet the needs of customers even under the most adverse conditions; It aims to ensure that company operations and services are carried out by giving the highest value to the safety of employees, the health of the public and employees, the protection of the environment and property. Thanks to all these measures taken and the infrastructure established, the continuity of the company's activities is planned. However, if the Board of

Directors decides that the company cannot continue its operations due to an emergency and unexpected situation despite the actions taken, the customers are informed of this situation and the necessary transactions for the transfer of customer assets are carried out with the customer's instructions.