

İSGOLD ALTIN RAFİNERİSİ A.Ş.
INDEPENDENT REASONABLE ASSURANCE REPORT ON
GOLD SUPPLY CHAIN IN ACCORDANCE WITH
INTERNATIONAL STANDARDS ON ASSURANCE
ENGAGEMENTS ISAE 3000 –ASSURANCE ENGAGEMENTS
OTHER THAN AUDITS OR REVIEWS OF HISTORICAL
FINANCIAL INFORMATION

AS OF 31 DECEMBER 2023

Independent Reasonable Assurance Report on Isgold Gold Refiner's Compliance Report 2023

To The Board of Directors and Management of Isgold Gold Refinery

We were engaged by İsgold Altın Rafinerisi A.Ş. ("Isgold Refinery") to provide reasonable assurance on its OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("the Report") related to period from January 1st to December 31st, 2023.

Scope of our work

A reasonable assurance engagement involves planning and performing procedures to obtain sufficient appropriate evidence to give reasonable assurance over the Refiner's Compliance Report. The procedures selected depend on our judgement, including the assessment of the risks of material misstatement of the Report whether due to fraud or error.

In making those risk assessments, we considered internal control relevant to the preparation and presentation of the Refiner's Compliance Report in order to design assurance procedures that are appropriate in the circumstances, but not for the purposes of expressing a conclusion as to the effectiveness of Isgold Gold Refinery's internal control over the preparation and presentation of the Refiner's Compliance Report. Our engagement also included: assessing the suitability of the Reporting Criteria in the circumstances of the engagement; evaluating the appropriateness of the methods, policies, procedures, environmental and sustainability responsibilities and models used in the preparation of the Refiner's Compliance Report; the reasonableness of estimates made by the directors; and evaluating the overall presentation of the Refiner's Compliance Report.

Management Responsibilities

The management of Isgold Gold Refinery is responsible for the preparation and presentation of the Report in accordance with the OECD Due Diligence Guidance (the Guidance). This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the management as relevant for demonstrating compliance with the Guidance are the activities described within the Refiner's Compliance Report.

Our Responsibility

Our responsibility is to carry out a reasonable assurance engagement and to express an independent conclusion to Isgold Gold Refinery, based on the procedures performed and evidence obtained, as to whether the Report, in all material respects, describes fairly the activities undertaken during the year to demonstrate that compliance is in accordance with the requirements of the OECD Due Diligence Guidance. We conducted our assurance engagement in accordance with International Standard on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information (ISAE 3000) issued by the International Auditing and Assurance Standards Board and the guidance set out in OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, OECD 2013 for ISAE 3000 Auditors (the "Audit Guidance"). ISAE 3000 requires that we obtain sufficient, appropriate evidence on which to base our conclusion.

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PKF Aday Bağımsız Denetim A.Ş., PKF International Limited ağının Üyesi olup hukuken bağımsız bir tüzel kişiliğe sahiptir ve bu ağın diğer üyelerinin faaliyetleri nedeniyle herhangi bir sorumluluk ya da yükümlülük kabul etmemektedir.

PKF Aday Bağımsız Denetim A.Ş. is a member firm of the PKF International Limited network of legally independent firms and does not accept any responsibility or liability for the actions or inactions on the part of any other individual member firm or firms.



This report has been prepared for Isgold Gold Refinery for the purpose of assisting the management in determining whether Isgold Gold Refinery has complied with the Guidance and for no other purpose. Our assurance report is made solely to Isgold Gold Refinery in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than Isgold Gold Refinery for our work, or for the conclusions we have reached in the assurance report.

We refer to the fact that the Compliance Report subject to our assurance engagement comprises the Annex "Countries of origin of precious metals". We draw attention to the fact that the Country of Origin Annex is not publically available.

Reasonable assurance procedures performed

We planned and performed our work to obtain all the evidence, information and explanations considered necessary in relation to the above scope. These procedures included:

- Detailed analysis of needs assessment to gain an understanding of Isgold Gold Refinery's processes, and risk management procedures around the gold supply chain in place.
- Interview with staff at the corporate office responsible for the preparation of the Report.
- Site visits to Isgold Gold Refinery to evaluate if the management system is in place as described in the compliance report
- Testing on a sample basis to evaluate whether the requirements of OECD Due Diligence Guidance are being executed and followed by Isgold.
- Assessing the suitability of the policies, procedures and internal management that Isgold Gold Refinery has in place to conform to the Guidance.
- Review of a selection of the supporting documentation, including gold supplier counterparty due diligence file and transaction's documentation and furthermore the due diligence documents and risk assessment for the upstream of its suppliers.
- Enquiries of relevant staff responsible for supply chain management
- Test a selection of the underlying processes and controls which support the information in the Report.
- Review of the presentation of the Report to ensure consistency with our findings.

We believe that the evidences we have obtained are sufficient and appropriate to provide a basis for our opinion.

Inherent limitations

Non-financial information, such as that included in the Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The absence of a significant body of established practice on which to draw allows for the selection of different but acceptable assessment techniques that can result in materially different measurements and can impact comparability. The nature and methods used to determine such information, as well as the assessment criteria may change over time. It is important to read Isgold Gold Refinery's methodology and gold supply chain policy available on Isgold Gold Refinery website (compliance@isgold.com).

Independence and competency statement

We comply with the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and we apply International Standard on Quality Control, 'Quality Control for Firms that Perform Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements'.

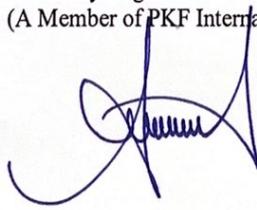
Accordingly, we maintain a comprehensive system of quality control including documented policies, systems and procedures regarding compliance with ethical requirements and professional standards (including independence, and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior) as well as applicable legal and regulatory requirements. In conducting our engagement, we confirm that we satisfy the criteria for assurance providers as set out in the Audit Guidance to carry out the assurance engagement.

Conclusion

In our opinion, the Refiner's Compliance Report prepared by Isgold Gold Refinery for the year ended 31 December 2023, in all material respects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein, is in accordance with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, OECD 2016

İstanbul- Türkiye, 10.06.2024

PKF Aday Bağımsız Denetim A.Ş.
(A Member of PKF International)



Abdulkadir SAYICI
Sorumlu Denetçi

Ek : Annex Responsible Supply Chain Compliance Report

ISGOLD ALTIN RAFINERISI A.S.

Borsa Istanbul A.S.

Precios Metals Responsible Supply Chain

Compliance Report

March 2024

"Istanbul Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide", prepared by Istanbul Stock Exchange, is a Compliance Guide which defines the minimum requirements required throughout the entire precious metal supply chain of precious metals Intermediary institutions operating in the Precious Metals Market and the refineries (Declarants) established in Turkey included in the Refinery List, based on the "Compliance Guidelines for Responsible Supply Chains for Minerals from Conflict- Affected and High-Risk Areas" in line with OECD's FATF recommendations.

This Compliance Guide aims that the Declarants;

- Comply with Stock Exchange regulations and International standards in the procurement of precious metals,
- Minimize the effects of existing risks by establishing in-house regulations, and determine the steps to be taken against possible risks,
- Fight against human rights violations,
- Avoid contributing to the conflict,
- Adopt high standards of due diligence to ensure international compliance,
- Fight against laundering proceeds of crime and financing of terrorism,
- Have a strong company management,
- Address, its Environmental and Sustainable responsibilities.

This report summarizes the compliance of ISGOLD Altın Rafinerisi A.S. with the "Istanbul. Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide".

1.Information About the Refinery

Title	İsgold Altın Rafinerisi A.S.
Address	İkitelli OSB Mh. Marmara Sanayi Sitesi S Blok No:5-6 Küçükçekmece - İSTANBUL
Reporting Period	01.01.2023 - 31.12.2023
Prepared By	Seçil Şahin - Internal Control and Supply Chain Compliance Officer Tuğba Erkoç - Internal Control and Supply Chain Compliance Officer
Responsible Procurement and Compliance Committee	Seçil Şahin - Internal Control and Supply Chain Compliance Officer Tuğba Erkoç - Internal Control and Supply Chain Compliance Officer Elif Tavzar - Entegrated Management System Specialist
Responsible Senior Management	Erdem Aşık - Chairman of the Board Miray Kuz - Deputy Chairman of the Board
Report Date	04.03.2024

At the core of the responsible precious metals supply chain is the Five Step Approach, which will be outlined in the Compliance Report. The Five Step Approach is considered the minimum standard for establishing and continually improving compliance practices for each of the key areas in the supply chain of precious metals intermediary Institutions and refineries. Corporate governance practices and principles are taken as basis in the operation and development of the internal control and compliance systems of precious metals intermediary institutions and refineries.

2.Summary of Activities Taken to Demonstrate Compliance

Step 1: Establishing a Strong Company Management System

Compliance Statement:

We fully comply with Step 1- Establishing a Strong Company Management System.

a. Is there a company policy regarding gold supply chain due diligence?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi has a Responsible Gold Supply Policy in line with the model set forth in the Istanbul Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide and OECD Compliance Guide Annex II for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

This Policy sets out our corporate responsibility and full commitment to ensure that the procurement and sale of precious metals does not directly or indirectly contribute to human rights violations, conflicts, irreparable environmental degradation, corruption, money laundering and financing of terrorism.

It is possible to access the Policy, which is open to the public and updated annually, from the "Company Policy" section of our corporate website.

b. Has an internal management structure been established to support supply chain due diligence?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi has a management system that effectively integrates supply chain due diligence and diligence into its organizational structure and processes.

Duties, roles and responsibilities for implementing the policy and supporting procedures and managing the due diligence process are clearly defined. An Internal Control and Supply Chain Compliance Officer has been appointed by the Board of Directors to develop an internal management structure in accordance with the principles in the policy. Reporting directly to the CEO, the Internal Control and Supply Chain Compliance Officer has all the necessary authorities to perform his/her duties and is responsible for all issues related to the precious metals supply chain due diligence of ISGOLD Altin Rafinerisi. Ultimate control and responsibility over the precious metals supply chain rests with Senior Management.

ISGOLD Altin Rafinerisi has formed a Responsible Procurement and Compliance Committee to form an audit structure consisting of Internal Control and Supply Chain Compliance Officers , Entegrated Management System Specialist. The Responsible Procurement and Compliance Committee is responsible for monitoring and approving the updated risk level determined for each counterparty.

c. Has a strong system of due diligence, control and transparency over the gold supply chain been established, including traceability and identification of other supply chain actors?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi identifies all new and existing suppliers and customers in the supply chain and records the necessary information and documents.

According to the Customer Acceptance and Risk Assessment Procedure, the customer's "Know Your Customer" documents must first be obtained and approved in order for gold to be accepted and processed. Then a customer profile is created. The CRM system (ISGOLD IOM) contains information about customers in the gold supply chain. The traceability system starts with a reference (ID) number belonging to the customer during the acceptance of the goods, and a tracking and risk assessment is

performed on a Transaction basis for each transaction lot. Goods acceptance, analysis results and product tracking are performed on a transaction basis.

d. Has a company-wide communication mechanism been established to encourage broad-based employee engagement and reporting of identified risks to the management?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi has developed a Grievance and Whistleblowing Procedure as part of the ongoing dialogue with our internal and external stakeholders. This procedure covers appropriate measures to allow anonymous communications. Via the e-mail address compliance@isgold.com, any interested party (employees, stakeholders or counterparties) - both individually and collectively - can raise concerns or raise issues related to the supply chain and related risks.

While the Human Resources department deals with internal complaints, the Internal Control and Supply Chain Compliance Officer is responsible for monitoring and evaluating all incoming external supply chain and risk-related communications and informing Senior Management about each newly identified risk. As part of the Quarterly Compliance report, or more frequently if necessary, s/he creates a list of complaints received for review by Senior Management. Depending on the nature of the complaint, Senior Management determines an appropriate action plan for resolving the complaint and engaging with the relevant parties. During the period during which the report was reviewed, any complaints and whistleblowing statements were recorded.

Step 2: Identification and Assessment of Risks in the Supply Chain

Compliance Statement:

We fully comply with Step 2 - Identification and Assessment of Risks in the Supply Chain.

a. Is there a process for identifying risks in the Supply Chain?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi implements a comprehensive process to identify and assess risks related to the precious metals supply chain. Sensitive customer management processes have been developed, consisting of "Know Your Customer" filters, which collect information on the risk of conflict, human rights and white-collar crimes in a robust process for reviewing all applying Counterparties.

Risk assessment process of ISGOLD Altin Rafinerisi prevents it from entering into any business relationship with any counterparty that does not fully comply with all the requirements set out in our Responsible Gold Procurement Policy. In addition, it has defined strict criteria to create a risk profile for each counterparty supplying precious metals. The risk assessment includes a detailed risk classification based on a three-level scale for each supply chain. When a high-risk supply chain is identified and no action is taken to reduce the risk, the business relationship with the counterparty is not established, or the business relationship with Fisks ruled to the current customer is terminated.

b. Are risks assessed within the framework of the standards of the due diligence system?

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi systematically performs supply chain due diligence procedures before entering into a business relationship with any counterparty supplying precious metals. Accordingly, in accordance with our policies and procedures, during the risk identification and assessment in the "Know Your Customer" stages, the enhanced due diligence process occurs when the Internal Control and Supply Chain Compliance Officer identifies any level of risk that requires further investigation to determine whether to continue the due diligence process or to determine non-compliance. In addition, we continuously monitor and review all transactions that occur throughout the entire business relationship, applying a comprehensive risk-based approach.

c. Is the Risk Assessment reported to senior management?

Compliance Indicator and Interpretation:

Senior Management is responsible for approving all new Counterparties that supply precious metals regardless of risk level. The Internal Control and Supply Chain Compliance Officer reports to the CEO at least quarterly any change in the level of risk associated with existing counterparties and/or metal suppliers. The CEO sets an appropriate roadmap for each situation; Senior Management retains ultimate control and responsibility for the precious metals supply chain of ISGOLD Altin Rafinerisi.

Step 3: Establishing and Implementing a Strategy That Can Respond to Identified Risks

Compliance Statement:

We fully comply with Step 3 - Establishing and Implementing a Strategy That Can Respond to Identified Risks.

a. Has a risk management strategy been developed for an identified risk by (1) reducing risk while continuing to trade, (ii) reducing risk while suspending trading, or (iii) avoiding risk?

Compliance Indicator and Interpretation:

OECD Due Diligence Guide and UN Business and Human Rights: It has defined and adopted an appropriate strategy for risk management of any new issue identified based on the prevention, detection and response model, as required by the Guiding Principles. This allows ISGOLD to manage risk through rigorous risk assessment and investigation (advanced due diligence) and mitigate and ameliorate adverse impacts in the precious metals supply chain. This approach includes determining the level of risk, taking into account the country of origin, the supplier, the product, the complexity of the supply chain and other relevant elements, information, and circumstances. The risk level is reviewed and updated at least quarterly.

b. Where a risk-reducing management strategy is implemented, does it include the measurable steps taken and achieved, the periodic re-assessment of risks, the monitoring of performance and the regular reporting to senior management?

Compliance Indicator and Interpretation:

As clearly stated in the Customer Acceptance and Risk Assessment Procedure, systems have been prepared in such a way that all procedures in the process, including the transportation phase and transit routes from the source of the precious metal, can be followed, within the scope of the Customer Acceptance Policy, relevant customer certificates and documents were recorded and examined, periodic reporting were made to the senior management, risk assessment was identified with on-site audits and additional applications, if necessary, and measures were taken to ensure the safe continuation of the business relationship or the acceptance of goods.

Step 4: Organizing an Independent Third Party Audit for Supply Chain Due Dilligence.

Compliance Statement:

We fully comply with Step 4 - Organizing an Independent Third Party Audit for Supply Chain Due Diligence.

Compliance Indicator and Interpretation:

ISGOLD Altin Rafinerisi made an agreement with PKF Istanbul, which is on the list of Independent Audit Firms, for the compliance assessment based on Istanbul Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide and signed a contract for the relevant compliance

process. ISGOLD Compliance Report and Independent Assurance Report are publicly available under the Company Policy title on the ISGOLD Altin Rafinerisi website.

Step 5:Supply Chain Due Diligence Report

Compliance Statement:

We fully comply with Step 5 - Supply Chain Due Diligence Report.

Compliance Indicator and Interpretation:

The report and information on the compliance of 2023 system, procedures, working principles and processes of ISGOLD Altin Rafinerisi with the OECD's "Compliance Guide for Responsible Supply Chain for Minerals from Conflict-Affected and High Risk Areas" and BIST's "Precious Metals Responsible Supply Chain Compliance Guide" can be found in the Compliance and independent assurance report in company policies published on our company's website www.isgold.com.

3.General Assessment

Is it in compliance with the requirements of Istanbul Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide in the relevant reporting period?

Yes. ISGOLD Altin Rafinerisi has implemented effective management, systems, procedures, processes and practices in order to comply with the requirements of Istanbul Stock Exchange Precious Metals Responsible Supply Chain Compliance Guide for the reporting year of 01 January 2023 - 31 December 2023, as explained in this Compliance Report. ISGOLD Altin Rafinerisi is committed to continuous improvement and the audit recommendations determined will be implemented in the next reporting period.

4.Other Report Comments

If the readers of this report want to give any feedback or ask any questions to ISGOLD Altin Rafinerisi regarding its content, they can contact our Internal Control and Supply Chain Compliance Officer by sending an e-mail:compliance@isgold.com .

Istanbul, 04.03.2024

ISGOLD Altin Rafinerisi A.S.

Seçil Şahin

Internal Control and Supply Chain
Compliance Officer

Tuğba Erkoç

Internal Control and Supply Chain
Compliance Officer

Miray Kuz

Deputy Chairman of the Board