PKF İstanbul
Aday Bağımsız Denetim ve S.M.M.M. A.Ş.

PKF
Accountants &
business advisers

ONSA RAFİNERİ 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 2021

Independent Reasonable Assurance Report on Onsa Refiner's Compliance Report 2021
To The Board of Directors and Management of Onsa Refinery

We were engaged by Onsa Rafineri Sanayi ve Ticaret A.Ş. ("Onsa Refinery") to provide reasonable assurance on its Compliance Report pepared in accordance with 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, 2021.

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 Onsa 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 Onsa 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 Onsa 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, 3rd Edition OECD 2016 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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This report has been prepared for Onsa Refinery for the purpose of assisting the management in determining whether Onsa Refinery has complied with the Guidance and for no other purpose. Our assurance report is made solely to Onsa Refinery in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than Onsa 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 Onsa 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 Onsa 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 Onsa.

• Assessing the suitability of the policies, procedures and internal management that Onsa 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 Onsa Refinery's methodology and gold supply chain policy available on Onsa Refinery website (https://www.onsarafineri.com).

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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 Onsa Refinery for the year ended 31 December 2021, 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, 3rd Edition, OECD 2016.

ADAY Bağımsız Denetim ve S.M.M.M. A.Ş.
A Member of PKF International

Abdulkadir SAYICI
Partner

İstanbul, Türkiye, 23.03.2022

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