

## **ONSA RAFİNERİ A.Ş.**

### **CASH TRANSACTIONS AND CASH MANAGEMENT PROCEDURE**

#### **Purpose**

The purpose of this procedure is to manage the cash transactions, cash management, and precious metal stocks of Onsa Rafineri A.Ş. in compliance with Turkish legislation and LBMA (London Bullion Market Association) standards. Furthermore, it aims to minimize the risks of money laundering and terrorist financing while ensuring the company's security.

#### **Scope**

This procedure covers all cash transactions, cash management, and the security of precious metal stocks within Onsa Rafineri A.Ş., including the determination of which transactions may be conducted in cash.

#### **Principles**

##### **Banking System Transactions**

Due to our principles, all transactions must be conducted through the banking system.

All purchase and sale transactions with mining companies must be carried out via bank accounts.

For transactions involving precious metals in cash exceeding 10,000 USD, the buyer and/or seller must be a registered member of Borsa Istanbul Precious Metals Market, except for transactions with mining companies.

For transactions involving precious metals in cash below USD 10,000, the current legal limits set by Turkish legislation must be followed.

Before transactions are conducted, the compliance officer must verify whether the relevant companies are eligible for the transaction.

For transactions below 10,000 USD, the applicable regulations in Turkey and the current limits set by the legislation are taken into account. Before any transaction is conducted, the compliance officer must confirm whether the relevant companies are eligible for the transaction.

##### **Accuracy and Reliability**

All cash transactions as well as the inflow and outflow of precious metals to/from the vault must be fully and securely recorded.

##### **Transparency**

Cash transactions and cash control processes must be conducted in a transparent and traceable manner.



## **Security**

Cash and precious metal stocks must be secured using security systems (cameras, alarms, etc.).

Information security must be ensured in accordance with ISO 27001 standards.

## **Compliance**

All transactions must comply with Turkish legislation and LBMA processes.

## **Procedures**

### **Cash Inflow Transactions**

Cash payments received from customers or other sources must be deposited into bank accounts, unless they are intended to be used directly for precious metal purchases.

Such payments must be verified using invoices, receipts, or similar documents and recorded in the accounting system.

### **Cash Outflow Transactions**

Payments must be executed based on authorized payment orders, either verbally or in writing.

Each payment must be supported by invoices, contracts, or equivalent documents and recorded in the accounting system.

All payments must comply with the rules and limits set forth in the signature circular.

## **Cash Management**

The vault is managed only by authorized personnel.

Access to the vault is restricted to authorized personnel and monitored via security cameras.

The cash and precious metal stocks in the vault are regularly counted and reported.

In case of any loss or irregularity, immediate action is taken.

## **Security of Cash and Precious Metal Stocks**

The stocks must be securely stored and protected against unauthorized access. The security of the stocks is ensured through security measures (such as alarms, cameras, etc.). In case of any loss or irregularity, immediate action must be taken.

## **Reporting and Traceability**

Regular information is provided regarding cash transactions and vault management processes. Information transfer can be done verbally and/or through reports. The information transfer and/or reports are submitted to management and, if necessary, stored for auditing purposes.

### **Audits and Training**

Cash transactions and cashier operations are subject to regular internal and external audits.

Cashier personnel must receive training on anti-money laundering (AML), counter-terrorism financing (CTF), and other relevant topics.

All employees must be informed about the importance of cash management and transaction security.

### **Compliance with Legislation and LBMA Standards**

This procedure has been prepared in compliance with the relevant legislation in Turkey and the necessary standards for LBMA's "Good Delivery List." This procedure is updated when it is necessary. When updating the procedure, changes in Turkish legislation and modifications made by LBMA are taken into account. During audits, the implementation and effectiveness of this procedure must be demonstrated and documented.

### **Other Provisions**

All employees must be informed about this procedure.

The effectiveness of this procedure must be regularly reviewed, and necessary improvements must be implemented.