

Purpose and Scope

The **Code of Business Ethics** of Onsa Refinery A.Ş. has been established to serve as a guide for the Company's **executives, employees, and business partners** (including suppliers, contractors, consultants, and any representatives acting on behalf of the Company).

These principles set out the **minimum standards** that must be followed within Onsa Refinery A.Ş. They serve as a reference point in decision-making processes and foster a spirit of trust, transparency, and integrity within the Company, reflecting positively on employees, customers, and stakeholders.

Onsa Refinery A.Ş. operates in accordance with the requirements of the **LBMA Responsible Gold Guidance**, the **Borsa Istanbul Precious Metals Responsible Supply Chain Compliance Guide**, **MASAK regulations**, and other international standards.

These ethical principles constitute the fundamental standards that ensure the Company's **corporate commitment** to a responsible gold supply chain.

The Code expresses the **ethical values and professional standards** expected from our Board Members and employees. It is well understood that any failure to comply with these principles could expose Onsa Refinery A.Ş. to serious risk.

In line with this strategic ethical framework, Onsa Refinery A.Ş. management ensures that all business activities are conducted in accordance with these principles and with full respect for corporate integrity and accountability.

Core Ethical Commitments

Onsa Refinery A.Ş.:

- Recognizes that **integration and cooperation** are essential for long-term success.
- Takes **responsibility** for its actions and fulfills its commitments to employees and shareholders.
- Always prioritizes **environmental considerations** and **quality assurance** in all processes.
- Protects **customer confidentiality** and shares personal data only with public authorities when required by law.
- Respects the **privacy and personal data** of individuals.
- Works in full compliance with all applicable **instructions, methods, rules, and guidelines** relevant to its area of responsibility.

- **Does not employ child labor.**
- **Opposes forced labor**, and terminates employment only in accordance with legal and contractual provisions.
- Complies with all occupational health and safety regulations and provides a **safe and healthy work environment** for all employees.
- Ensures **clean, safe, and secure working conditions**.
- Builds a workplace culture based on **human rights, accountability, excellence, and trust**.
- Rejects all forms of **discrimination**, ensuring that recruitment and evaluation are based solely on qualifications and performance.
- Does not tolerate **physical, psychological, or verbal abuse**, and avoids any action that may undermine the dignity of employees.
- Promotes a **transparent, respectful, and collaborative** working environment based on solidarity and mutual respect.
- Tolerates **no form of harassment or discrimination**.
- Keeps promises that can realistically be fulfilled.
- Ensures that **customer complaints are addressed promptly**.
- Acts with **environmental awareness and social responsibility** in all business operations.
- Ensures that all directors and employees comply with applicable **laws, rules, and regulations**.
- Prevents **money laundering and corruption**, complies with **MASAK suspicious transaction reporting obligations**, and adheres to **competition laws**, avoiding unethical or unfair competitive practices.
- Complies with all **sectoral laws and tax regulations**.
- Keeps all business records **accurate and up to date**.
- Implements and enforces **Know Your Customer (KYC)** procedures.
- Applies the **Responsible Gold Supply Chain Principles** and encourages customers and suppliers to do the same.
- Communicates with all stakeholders in a tone consistent with the Company's values and corporate identity.
- Uses **company resources responsibly** and efficiently.
- Carefully identifies and manages **business risks** in all areas of operation.

Commitment to Ethical Conduct

Onsa Refinery A.Ş. **does not tolerate violations** of this Code of Business Ethics. All Board Members and employees are expected to adhere to both the **letter and the spirit** of these principles.

Violations of these standards may result in **disciplinary action**, including termination of employment.

The Company encourages all employees to **report any violations** of laws, rules, regulations, or this Code to the appropriate managers without fear of retaliation. No employee will face disciplinary or punitive action for reporting concerns in good faith.

Reports of potential violations or noncompliance can be made to:

✉ **uyumbirimi@onsarafineri.com**

✉ **etik@onsarafineri.com**

Board of Directors Approval Date	Version No:
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