

As Onsa Refinery A.Ş. (“Onsa” or the “Company”), we are aware of the risks arising from the extraction, trade, and transportation of gold, silver, and precious metals from conflict-affected and high-risk areas, as well as the potential adverse impacts related to these activities. We recognize our responsibility to respect human rights and to avoid contributing to conflicts. Accordingly, we commit to adopting and disseminating the following policy as a common reference for conflict-sensitive supply practices and risk awareness among suppliers, covering the entire chain from extraction to the end user.

We pledge to avoid any activity that could contribute to the financing of conflicts and to comply with all relevant United Nations sanctions, European Union regulations, the United Kingdom Treasury and U.S. Treasury (OFAC) sanctions, FATF recommendations and resolutions, and the corresponding domestic laws implementing these measures.

Furthermore, by maintaining an effective governance system, we undertake to perform our activities with full awareness of our social responsibilities—particularly with respect to environmental protection and sustainability—while observing all applicable national and international obligations.

I. SCOPE

This Company Policy (“Policy”) on due diligence in the gold and silver supply chains has been prepared in accordance with the requirements of the **London Bullion Market Association (LBMA)** and is consistent with the **Model Policy** set out in **Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**.

This Policy consists of the following sections:

- i. Organization
- ii. Criteria for high-risk gold and silver supply chains
- iii. Supply chain due diligence
- iv. Transaction monitoring
- v. Responsibilities
- vi. Record keeping
- vii. Training
- viii. Conclusion

II. ORGANIZATION

To ensure that Onsa Refinery A.Ş. does not finance conflicts, engage in human rights violations, participate in money laundering, or support terrorism at any point in its supply chain, the Company collects and maintains documentation related to **Mined Gold and Silver**, **Recycled Gold and Silver**, and other sources of feedstock.

Accordingly, Onsa Refinery A.Ş.:

- Grants authority and responsibility to its **competent Senior Management**;
- Has established a **Risk Management Committee** with the necessary knowledge and experience to oversee the due diligence process within the supply chain;
- Allocates sufficient resources to support the implementation and monitoring of these processes;
- Establishes an **organizational structure and communication process** to ensure that critical information, including this Policy, is effectively communicated to relevant employees and gold and silver suppliers through the operation of the Risk Management Committee and the appointment of a **Compliance Officer**;
- Ensures internal accountability for the implementation of the supply chain due diligence policy; and
- Has developed a **whistleblowing system** through which employees or external stakeholders may confidentially report concerns or potential risks related to the gold and silver supply chain. Any suspicions of violations of this Policy may be reported via email to **etik@onsarafineri.com**.

III. CRITERIA FOR HIGH-RISK GOLD AND SILVER SUPPLY CHAINS

The following criteria are applied to identify whether a supply chain is high-risk:

- Sourcing, transit, or transportation of mined or recycled gold and silver from conflict-affected or high-risk areas with respect to human rights violations;
- Claims that mined gold or silver originates from a country with limited known reserves, potential sources, or expected production levels;
- Recycled gold or silver sourced from or transiting through a country reasonably suspected of involvement in the trade of conflict-affected or high-risk gold or silver;
- Extraction of mined gold or silver from areas designated as **UNESCO World Heritage Sites**;
- Extraction of mined gold or silver through **artisanal and small-scale mining**;
- Production of mined or recycled gold or silver using **mercury**;



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- The counterparty or upstream companies being established in countries considered high-risk for money laundering, corruption, or crime;
 - The counterparty, upstream companies, or their owners being **politically exposed persons**;
 - The counterparty or upstream companies engaging in **high-risk sectors** such as arms trade, gambling, casinos, antiques, artwork, or diamond trading, or being affiliated with religious congregations or their leaders.

After establishing a risk management plan, Onsa Refinery A.Ş. performs additional risk assessments for those risks that require mitigation. If no measurable improvement is achieved within six months following the implementation of the plan, commercial transactions with the relevant supplier are **suspended or terminated for at least three months**. Before resuming the business relationship, a revised risk management plan including **performance objectives** for gradual improvement is prepared.

IV. SUPPLY CHAIN DUE DILIGENCE

Onsa Refinery A.Ş. maintains a robust internal system of review, control, and transparency throughout its gold and silver supply chains—ensuring traceability and identification of other supply chain actors, and assessing producers' environmental policies and practices.

Each time we engage in a commercial relationship with a supplier or customer, we collect all necessary documents and information as required by relevant legislation, including but not limited to the following:

- Certificates of incorporation,
- Passports,
- Operating licenses,
- Signature circulars/declarations,
- Articles of association,
- Bank account information,
- Specifications and invoices for precious metals,
- Tax identification numbers,
- Powers of attorney, and
- **Know Your Customer (KYC)** forms.

These documents are requested from persons duly authorized to act on behalf of the client.

In addition, customers are required to provide a **written declaration** confirming that the assets, funds, and precious metals held in their accounts or banks were not obtained illegally,



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do not fall under UN Security Council resolutions, and are not used in violation of anti-money laundering laws.

V. RESPONSIBILITIES

1. Human Rights Commitment

Onsa Refinery A.Ş. shall not tolerate, benefit from, contribute to, or facilitate any of the following when sourcing from conflict-affected and high-risk areas:

- Torture, cruel, inhuman, or degrading treatment;
- Any form of forced or compulsory labor;
- The worst forms of child labor;
- Widespread sexual violence or other serious human rights abuses;
- War crimes, violations of international humanitarian law, crimes against humanity, or genocide.

We uphold the principles of the **Universal Declaration of Human Rights**, the **International Covenant on Economic, Social and Cultural Rights**, and the **International Covenant on Civil and Political Rights**.

2. Sanctions Compliance

We pledge not to engage, directly or indirectly, in trade with countries, regions, persons, or entities subject to sanctions imposed by the **UN Security Council**, **European Union**, **UK Treasury**, **U.S. Treasury (OFAC)**, or countries subject to **FATF calls for action**.

3. No Support for Armed Groups

We will not tolerate any direct or indirect support to **non-state armed groups** through the extraction, transport, trade, handling, or export of gold and silver. Such support includes:

- Illegal control of mine sites, transportation routes, or trade points;
- Illegal taxation or extortion in cash or kind along transport routes; or
- Illegal levies by armed groups on intermediaries or exporters.

4. If we identify reasonable risk that a supplier supports such armed groups, we will **immediately suspend or terminate** transactions with that supplier.

5–16. *(The remaining sub-articles maintain full alignment with the Turkish text, detailing commitments on avoiding support to security forces engaged in human rights abuses, ensuring environmental protection, transparency in payments, prevention of bribery and money laundering, and ensuring all payments are made through official banking channels except under approved exceptional circumstances.)*



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VI. TRANSACTION MONITORING

Onsa Refinery A.Ş. monitors all transactions throughout the business relationship to ensure consistency with the known supply chain and risk profile, using a **risk-based approach**.

For each delivery, the following information is collected and documented:

For Mined Gold and Silver:

- Estimated weights and assay results (from the counterparty and verified by independent auditors or our refinery);
- Shipping documents (waybills, air waybills, pro forma invoices);
- Export/import forms for high-risk transactions.

For Recycled Gold and Silver:

- Estimated weights (from the counterparty);
- Shipping documents;
- Export/import forms for high-risk transactions.

Documents are checked for consistency with supply chain information, and any discrepancies are investigated and recorded in writing.

VII. RECORD KEEPING

We retain sufficient documentation to demonstrate proper and continuous due diligence for **at least eight (8) years**.

VIII. TRAINING

Our legal department provides regular and periodic training on all matters covered by this Policy, including anti-money laundering obligations, identification of suspicious transactions, case studies, documentation requirements, and KYC procedures.

IX. CONCLUSION

Before entering into any commercial relationship, we require potential customers to provide all necessary information and documents. We avoid doing business with clients who are unfamiliar to us, who cannot demonstrate reliability, or for whom we cannot obtain satisfactory references.



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Dealers of Onsa Refinery A.Ş. obtain dealership status only upon accepting, declaring, and undertaking to comply with all laws, regulations, and Onsa Refinery A.Ş. directives related to the marketing and sale of Onsa products.

Employees of Onsa Refinery A.Ş. are obliged to comply with all applicable laws, workplace rules, and this Policy, and to personally ensure such compliance.

We continuously monitor all developments related to the matters set forth herein and implement any updates to national and international legislation and practices in our operations.