

1. PURPOSE

This Policy sets out the procedures for reporting any act or omission that constitutes or may constitute an unlawful act or misconduct. Such cases include violations of laws and regulations, breaches or encouragements of violations of the values and principles established in Onsa Refinery A.Ş.'s **Code of Ethics**, violations of internal audit principles, company policies, and rules, as well as actions or omissions that may cause harm (e.g., commercial, financial, environmental, safety-related, or reputational) to Onsa Refinery A.Ş., its clients, shareholders, partners, third parties, or the general public.

2. FUNDAMENTAL PRINCIPLES

The Whistleblowing and Information Disclosure Policy of Onsa Refinery A.Ş. is designed to ensure that any employee, external stakeholder, or person involved in the precious metals supply chain can raise concerns or report newly identified risks. It provides a communication mechanism that allows individuals to share information about suspicious behavior and/or illegal acts with the competent authorities in order to protect the **public interest, national security, and public health**.

Onsa Refinery A.Ş. conducts its activities according to the **highest ethical standards** and with **integrity**. The Company supports a culture of **open communication** and **accountability** to prevent unethical or unlawful actions.

All whistleblower reports are carefully reviewed and investigated as promptly as possible, following an initial assessment.

3. IMPLEMENTATION OF THE POLICY

• a. Reporting and Notifications

Reports may concern behavior or actions **by employees against the Company, by the Company against employees, or by external stakeholders**.

Issues of concern include, but are not limited to:

- Financial corruption, fraud, or misconduct;
- Violations of criminal, administrative, or other legal obligations;
- Human rights violations (including health, safety, or child labor risks);
- Serious environmental damage;
- Situations that may endanger a safe and respectful work environment;

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- Acts constituting crimes under the **Turkish Penal Code** (e.g., theft, fraud, bribery, abuse of trust, forgery, concealment or destruction of documents, misuse of signatures, crimes against life and bodily integrity, sexual assault, or harassment);
 - Discrimination, harassment, inappropriate treatment, or unethical behavior;
 - Attempts to conceal violations of company policies, such as the **Anti-Money Laundering and Counter-Terrorist Financing Policy** or the **Anti-Bribery and Corruption Policy**;
 - Direct or indirect violations of the **Gold Supply Chain Due Diligence Policy** or other company compliance frameworks;
 - Actions that could jeopardize the Company's compliance with international standards;
 - Violations or concealment of violations of responsible sourcing procedures;
 - Actions damaging Onsa Refinery A.Ş.'s reputation or brand value;
 - Violations of national or international laws, including those on sanctions, competition, anti-money laundering, anti-corruption, data protection, or capital markets;
 - Violations covered under **MASAK (Financial Crimes Investigation Board)** suspicious transaction reporting obligations.
 - **b. Reporting Channels**

Any employee, stakeholder, or related party who becomes aware of **serious corruption or misconduct** must immediately report such information to:

- **etik@onsarafineri.com**
- **compliance@onsarafineri.com**
- or to the **Internal Audit Department / Compliance Unit** at Onsa Refinery A.Ş., located at *Osmangazi Mahallesi 3117 Sokak No: Esenyurt – Istanbul*, Tel: **+90 212 886 71 00**.

Onsa Refinery A.Ş. encourages the reporting of any suspicious activities or tolerance breaches in the precious metals supply chain, preferably with supporting evidence.

The Company promotes an **honest and transparent approach** and supports anyone acting in good faith. Employees who report suspected bribery or corruption are **protected from retaliation**, such as disciplinary action, dismissal, threats, or mobbing.

Reports made to the Internal Audit Department or via the above email addresses are handled confidentially. Any violation of this protection is considered **unacceptable**. The Risk Committee reviews reported cases and imposes appropriate disciplinary measures where necessary.

- **c. Content of Reports**

To ensure that a reported incident can be properly evaluated, whistleblowers should provide as much **clear, detailed, and accurate information** as possible, ideally addressing the following:

- Names of the individuals involved or suspected;
- When, where, and between whom the event occurred;
- When the issue first arose and whether it has recurred;
- Whether it has occurred yet, and if not, when it is expected to occur;
- When and how the reporter became aware of the issue;
- Any detailed explanations or supporting information;
- Whether supervisors or managers are aware of the issue and whether any action was taken;
- Whether the reporter witnessed the incident directly or learned of it from another source;
- Whether any evidence or documentation exists;
- Whether the act constitutes a violation of law, particularly of the **Turkish Penal Code** or **MASAK** regulations.

- **d. Review of Reports**

All reports received by Onsa Refinery A.Ş. are carefully assessed. The Company aims to ensure that all allegations are examined **effectively and appropriately**.

Upon receipt of a report, relevant **documents and evidence** are gathered promptly to determine whether a **judicial or administrative investigation** should be initiated. In cases of reasonable suspicion, the necessary referrals to the competent authorities are made.

- **e. Confidentiality**

Onsa Refinery A.Ş. respects the whistleblower's wish to remain **anonymous**. Reports submitted through the designated channels are treated as **strictly confidential**.

The whistleblower may choose to:

- Remain anonymous and not disclose identity or contact information; or
- Provide identity and contact details with consent for limited access by authorized persons, enabling direct follow-up during the investigation if necessary.



ONSA RAFİNERİ A.Ş.

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All persons involved in the investigation are required to maintain **confidentiality**, protect the **privacy and dignity** of individuals, and refrain from disclosing information about the process or those involved.

Even if a report later proves unfounded, Onsa Refinery A.Ş. guarantees the **confidentiality** of both the information and the whistleblower's identity.

4. NON-RETALIATION

Onsa Refinery A.Ş. upholds the principle that **no retaliation** shall be taken against anyone who raises a genuine concern or suspicion in good faith. Employees should feel safe and confident that reporting misconduct will not adversely affect their careers.

No employee shall face any adverse consequences—such as disciplinary action, dismissal, threats, or mobbing—for reporting concerns in good faith. Even if no wrongdoing is ultimately found, no penalty shall be imposed for raising the concern.

Any form of threat, retaliation, punishment, or discrimination against whistleblowers or anyone involved in an investigation is strictly prohibited. The Company reserves the right to take **legal action** against anyone who retaliates.

Conversely, those who intentionally submit **malicious, baseless, or defamatory** complaints may face disciplinary or legal consequences.

5. VALIDATION AND INVESTIGATION PROCESS

The **Internal Audit Department and/or Compliance Unit** is responsible for verifying the validity of all reports.

Investigations are conducted fairly, impartially, and confidentially. These units may seek assistance from other departments or, when appropriate, from **external experts**, provided confidentiality is maintained.

Upon completion, a summary report is prepared, outlining findings and evidence. Relevant departments are informed, and corrective measures are decided in coordination with management.

If insufficient evidence is found, the case is documented and archived with an explanatory note.



The Internal Audit and/or Compliance Unit regularly reports to the **Board of Directors** on the types of complaints received and the outcomes of investigations.

Reports are evaluated as quickly as possible to confirm their validity and credibility. Matters within Onsa's authority are escalated to the Board. Internal Audit and/or Compliance investigate employee-related or partner-related violations, while **Legal and Compliance Counsel** handles cases involving specific legal breaches.

Any information obtained illegally during the process will **not** be considered as valid evidence.

6. AUTHORITY AND RESPONSIBILITY

All employees and managers of Onsa Refinery A.Ş. are responsible for complying with this Policy and supporting its procedures and controls. The Company ensures that all **business partners** are made aware of this Policy.

Employees may contact the **Internal Audit Department and/or Compliance Unit** for questions regarding the Policy's implementation.

7. PROTECTION OF PERSONAL DATA

Onsa Refinery A.Ş. declares that all **personal data** obtained during the handling of reports—including data related to the whistleblower, accused, or other parties—will be processed in full compliance with **applicable data protection legislation** and in accordance with the **Onsa Refinery A.Ş. Personal Data Protection Policy**.

Only the data strictly necessary to verify and process the report will be used.

The Internal Audit and/or Compliance Unit acts as the **data controller**, ensuring data privacy and security throughout the process. Data may be disclosed to the **Board of Directors**, relevant departments, or **judicial authorities** if required by law.

All documents and data will be protected against accidental or unlawful destruction, loss, or unauthorized disclosure and will be retained only as long as necessary for proper completion of the reporting process.

Board of Directors Approval Date	Version No:
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