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|  | <b>Precious Metals Supply Chain Policy</b> | Document No       | UYM.PO.13.E    |
|                                                                                  |                                            | Release Date      | 01.08.2023     |
|                                                                                  |                                            | Revision No       | 01             |
|                                                                                  |                                            | Revision Date     | 03.03.2025     |
|                                                                                  |                                            | Information Class | General Access |

# PRECIOUS METALS SUPPLY CHAIN POLICY

Version

**1.2**

Controller

**Hülya CİVELEK**

Approved by

**Sarp TARHANACI**

Date

**March 2025**

Next Review

**March 2026**

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## PRECIOUS METALS SUPPLY CHAIN POLICY

### 1. Foreword

As a leading precious metal refiner, Aleks Metal Rafineri conducts all its business to the highest ethical, moral and social responsibility standards. Integrity, honesty, and transparency are the foundation of our business.

### 2. Scope

This Supply Chain Policy applies to all precious metals handled by Aleks Metal Rafineri and to all of its business partners engaged in mining, refining, manufacturing, and trading precious metals.

It does not apply to general procurement (e.g., office furniture, food, energy, etc.) or other transactions outside the precious minerals supply chain.

Our business partners include Miners and Mining Companies, Scrap Dealers, Refiners, Metal Traders, Jewellers, Watchmakers, Banks and other Financial Intermediaries, Central Banks, Mints, and Numismatic Dealers. From the beginning, a philosophy of risk assessment, evaluation, monitoring, and control has been at the core of our business culture.

All material and potential risks are monitored and mitigated in everything we do—from sourcing our precious metals feedstock to refining, trading, manufacturing, or delivering finished products.

We are aware of the risks of inadvertent involvement in or contribution to illegal practices that may be associated with the extraction, processing, trading, handling, and exporting of precious metals from any area, particularly from Conflict-Affected and High-Risk Areas (CAHRAs).

Our definition of high-risk aligns with Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG), the LBMA, and the LPPM Responsible Guidance.

The Aleks Metal Rafineri Compliance Officer has the authority to deny any new business partners classified as high-risk. Senior management and the Board retain ultimate responsibility for the company's engagement in precious metals supply chains, in line with our Compliance Manual, which defines the due diligence process.

This policy ensures that all operations and engagements are aligned with:

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs

OECD DDG Supplement on Gold

Responsible Jewellery Council Code of Practices (RJC COP) and Chain of Custody (RJC COC)

LBMA Responsible Gold and Silver Guidance

LPPM Responsible Platinum/Palladium Guidance

EU Conflict Minerals Regulation

Turkish regulations on AML, CFT, child labor, and human rights compliance

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### 3. Our Commitment

Aleks Metal Refineri's commitment includes, but is not limited to:

Combatting human rights abuses, including child labour, forced or compulsory labour, human trafficking/smuggling, and slavery or servitude associated with the extraction, transport, or commercialisation of minerals

Avoiding contribution to any conflict

Complying with AML standards

Complying with CFT (Combating Financing of Terrorism) standards

Excluding any direct or indirect support to state and non-state armed groups, or illegally acting public or private security forces

Avoiding bribery and fraudulent misrepresentation of the origin of precious metals

Ensuring payment of taxes, fees, and royalties to governments

Defining clear rules for responsible sourcing

Conforming with relevant UN sanctions and domestic laws

Supporting legalisation and formalisation of Artisanal and Small-Scale Mining (ASM) entities and their trading partners, in line with OECD guidelines

All these commitments are upheld through the design, implementation, and continual improvement of Aleks Metal Refineri's management systems and procedures.

We work with stakeholders including the European Partnership for Responsible Minerals (EPRM), Swiss Better Gold Association (SBGA), Fairmined, and Fairtrade, and engage with local and international parties to promote responsible sourcing.

Employees and business partners are encouraged to report concerns through our Whistleblowing Mechanism or Grievance Procedure.

### 4. The Precious Metals Sourcing Process

Aleks Metal Refineri fully commits to:

Not tolerating or facilitating serious abuses as listed in Annex II of the OECD Guidance:

Torture or cruel, inhuman and degrading treatment

Forced or compulsory labour

Child labour and worst forms of child labour (ILO Convention No.182)

Widespread sexual violence and human trafficking

War crimes, crimes against humanity, or genocide

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## Bribery and corruption

Not doing business with suppliers linked to such abuses, unless they can demonstrate robust mitigation and remediation actions.

Not supporting non-state armed groups or illegal taxation/extortion at mine sites or transport routes.

Suspending relationships with upstream suppliers if linked to armed groups or abusive security forces.

Ensuring public/private security forces operate under human rights law and Voluntary Principles on Security and Human Rights.

Reporting money laundering and terrorism financing risks to relevant financial intelligence units.

Performing KYC, AML, CFT, and Know Your Product (KYP) procedures before engaging with business partners.

Requiring business partners to disclose taxes and fees in line with the Extractive Industries Transparency Initiative (EITI).

Monitoring business partners through annual due diligence updates and on-site checks where required.

Driving risk decisions through the Responsible Sourcing Committee (RSC), chaired by the CEO.

## 5. ASM (Artisanal and Small-Scale Mining) and High-Risk Materials

### ASM Sourcing:

Aleks Metal Rafineri supports sourcing from legitimate ASM operations as defined in the OECD ASM FAQ. ASM activities must not contribute to conflict or human rights violations. We work only with ASM entities that demonstrate a commitment to formalisation and legalisation and are willing to engage in a transparent and traceable supply chain.

### Financial Channels:

All precious metals and financial transactions are executed exclusively through official banking channels.

### Supplier Requirements:

All precious metals suppliers must acknowledge and commit in writing to compliance with a supply chain policy aligned with Annex II of the OECD DDG.

### Transportation Partners:

Aleks Metal Rafineri collaborates only with high-security logistics providers that are OECD and LBMA guidance-compliant.

### Record Keeping:

We maintain all documentation related to the supply chain for a minimum of 10 years, as required by applicable law.

## 6. Environmental and Social Due Diligence

Aleks Metal Rafineri expects suppliers to:

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Implement and maintain environmental management systems in compliance with ISO 14001 or equivalent.

Manage hazardous materials responsibly and minimise environmental impact.

Take preventive action to avoid environmental incidents and have procedures in place for emergency response.

Continuously improve their sustainability performance through measurable targets and reporting.

Where a supplier's management system is lacking, Aleks Metal Rafineri may support improvement initiatives including training, consultation, and development of responsible policies.

## 7. Excluded Countries

Aleks Metal Rafineri does not accept precious metals originating from the following countries due to international sanctions, conflict risks, or failure to meet OECD DDG, LBMA, or RJC expectations:

**Africa:** Mali, Sudan, South Sudan, Somalia, Libya, Central African Republic, Democratic Republic of Congo, Guinea Bissau, Zimbabwe

**Middle East & Asia:** Afghanistan, Iran, Iraq, Syria, Yemen, Myanmar, North Korea

**Americas & Europe:** Venezuela, Cuba, Haiti, Belarus, Russia

**Others:** ABC Islands (Aruba, Bonaire, Curaçao)

We do not accept materials of African origin sourced through non-African-based intermediaries or "gold hubs" without direct due diligence and risk assessment.

## 8. Enhanced Due Diligence (EDD)

For **high-risk countries or transactions**, Aleks Metal Rafineri applies an Enhanced Due Diligence process, including:

Site visits and audits (when feasible)

Third-party validation

Deep background checks on beneficial ownership and political exposure

Verification of ESG practices and supply chain traceability

Rejection of any source or transaction failing to meet compliance expectations

## 9. Recycled Materials and Documentation Requirements

### Recycled Materials Origin Declaration:

For recycled materials, Aleks Metal Rafineri requires suppliers to submit a **Statement of Conformance (SOC)** for each delivery, confirming the origin of the precious metals beyond the immediate supplier.

### Mandatory Due Diligence Documents:

All suppliers must provide comprehensive documentation covering:

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**Know Your Customer (KYC)** procedures

**Anti-Money Laundering / Combatting the Financing of Terrorism (AML/CFT)** protocols

**Know Your Product (KYP)** analysis

**Environmental, Social, and Governance (ESG)** policies

These documents must align with Aleks Metal Rafineri's due diligence and risk management requirements and are subject to periodic verification and updates.

## 10. Secured Data Storage (SDS) and Digital Transparency

Aleks Metal Rafineri is preparing to implement a **Secured Data Storage (SDS)** system based on **blockchain technology** to digitise and automate its precious metals sourcing and traceability procedures. This system will:

Ensure full transparency of the supply chain

Strengthen due diligence compliance with LBMA and OECD standards

Allow suppliers to upload all due diligence information for each shipment

Link the shipment to:

**Origin:** the immediate supplier

**Genesis:** the upstream source of the material

Suppliers will be informed of technical requirements and obligations under this system and provided guidance to ensure compatibility and compliance.

## 11. Final Remarks

Aleks Metal Rafineri reiterates its unwavering commitment to:

Upholding ethical and responsible business conduct

Ensuring that no precious metals entering its supply chain are linked to conflict, criminal activity, or environmental and human rights abuses

Promoting transparency, legal compliance, and sustainability at all levels of the supply chain

This Precious Metals Supply Chain Policy is reviewed annually and updated as necessary in response to changes in legal frameworks, international standards, and emerging supply chain risks.

**For more information or to report any concerns related to our supply chain**, please contact our Compliance Department via our official grievance mechanism or at:

REPORTS CAN BE SUBMITTED ANONYMOUSLY VIA:

**Email:** [ethics@aleksmetal.com](mailto:ethics@aleksmetal.com)

**Phone & SMS & Whatsapp:** +90 850 840 1237

**Hotline:** <https://aleksmetal.com/en/hotline>

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**Address:**

**Aleks Metal Rafineri (AMR)**

AMR , İkitelli OSB mah. Marmara P Blok Sk P Blok No 11 Küçükçekmece / İstanbul – Turkey.

US Dodd Frank Act Section 1502. High-risk is defined according to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, LBMA and LPPM definitions and Aleks Metal Refinery's risk assessment