

	Grievances and Whistleblowing Policy	Document No	UYM.PO.06.E
		Release Date	01.08.2023
		Revision No	01
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Grievances and Whistleblowing Policy

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Grievances and Whistleblowing Policy

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1 Principles

Aleks Metal Rafineri is committed to conducting business in accordance with the law and the highest ethical standards. In line with our Values and Code of Conduct, the implementation of this policy further supports the following principles:

- We ensure that grievances and complaints will be addressed in a timely, transparent, accessible, and equitable manner.
- We ensure fair and objective investigation of founded grievances and complaints, based on facts or reliable evidence.
- The grievances and whistleblowing policy is rights-compatible and forms part of engagement and ongoing dialogue with our internal and external stakeholders in the spirit of continuous improvement.
- We will make every effort to ensure that the whistle-blower and all interested parties will be protected against any reprisal, discrimination, or other adverse employment consequences - excluding compliance with law and disciplinary rules.
- All interested parties are encouraged to voice concerns to Aleks Metal Rafineri regarding misconduct, wrongdoing, or any identified risk within the precious metals supply chain at the earliest opportunity with a view to them being fully investigated by the appropriate authority.

2 Objective

The purpose of this Policy is to provide a transparent framework for the process of receiving, investigating, and responding to grievances in order to promote mutual confidence and trust with all interested parties (affected persons or whistle-blowers).

3 Internal Normative References

The following documents are incorporated by reference into and form part of the grievances and whistleblowing policy:

- Code of Conduct
- Precious Metals Supply Chain Policy
- Modern Slavery Statement
- Anti-bribery and Corruption Policy
- Entertainment and Gifts Policy
- AML Due Diligence Procedure
- Compliance Manual
- Quality, Environmental, Health and Safety, and Sustainability Policy

4 Definitions

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- **Interested parties:** affected persons and/or whistle-blowers.
- **Affected person:** an affected person consists of any individual, group of individuals, or community.
- **Complaints:** relatively minor concerns, negative comments, or expressions of discontent raised with regard to the company or the activities and impacts of its contractors.
- **Grievances:** formal and serious concerns and allegations brought forward by any interested party, who alleges damage, impact, or dissatisfaction as a result of the company's activities and impacts. The grievance entails the expectation of a response or a corrective action.
- **Grievances and whistleblowing mechanisms:** the interrelated processes that support implementation of this policy, such as receiving, investigating, and responding to a grievance or complaint.
- **Whistle-blower:** any collaborator, contractor, client, supplier, and/or third-party that raises complaints and/or grievances related to the company or its contractors' activities and impacts.

5 Scope

a) This Policy applies to collective and individual complaints and grievances. Any complaint or grievance raised by any interested party can be considered, including both external and internal allegations.

b) This Policy encourages reporting of abuses, risks, and behaviors that do not comply with any law or Company Regulations, including, but not limited to, the following types of complaints:

- Corruption, fraud, bribery
- Damage to property, theft
- Employee misconduct and labor practices
- Health and safety; working conditions
- Environmental risks and harms
- Security of people, precious metals, property
- Money laundering
- Financing terrorism
- Aggravated tax misdemeanors
- Breach of sanctions/embargoes
- Human rights and child labor violations

c) The following concerns are not covered under this Policy: unevicenced complaints; business and financial decisions that do not involve wrongdoing or illegality; any matter already addressed pursuant to disciplinary or other Aleks Metal Rafineri procedures; career-related or other personal grievances; or solicitation of sensitive information for ulterior purposes.

d) Frivolous grievances will not be investigated. Only evidenced grievances and complaints will be investigated. Evidence and detailed information must be provided, including at least: name

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of impacted person and/or organization, description of facts, witnesses, date, time, location of relevant events. Messages without these details will not be considered. The name of the reporting person need not be reported if they feel anonymity is necessary for privacy or protection.

6 Responsibility

a) Aleks Metal Rafineri encourages achieving solutions through appropriate normative methods prior to the use of formal grievance and whistleblowing processes in order to achieve a mutually acceptable resolution.

b) Internal grievances and complaints shall be reported first to the manager following the hierarchical report. Should the individual or group not find it possible or appropriate to contact his/her managers, complaints can be registered via e-mail to an external ombudsman.

c) The whistle-blower may make the disclosure via electronic means of communication to the dedicated mailbox is available to any of the interested parties (affected persons and whistle-blowers) to register grievances and complaints compliance.hotline@aleksmetal.com or in person. The dedicated mailbox is available to any of the interested parties (affected persons and whistle-blowers) to register grievances and complaints. Telephone calls should be made to AMR. Hotline phone and Whatsapp number: +90 532 232 5812. Paper disclosures may be posted to AMR , İkitelli OSB mah. Marmara P Blok Sk P Blok No 11 Küçükçekmece / İstanbul – Turkey.

d) The external ombudsman is responsible for monitoring and assessing all incoming communications and keeping Senior Management informed about every relevant newly identified risk and concern.

e) According to the nature of the complaint, a department/responsible member of Senior Management will be assigned to determine an appropriate action plan for its resolution and for the engagement process with the interested parties. Assignments will be made according to the type of complaint.

f) Milestones in the complaint/grievance process will be communicated to the individual or group as follows:

- Receipt of complaint/grievance: within two weeks of registration of a complaint or grievance, an initial response will acknowledge the receipt and explain the process to be followed, indicating a timeframe within which the interested parties can expect the complaint/grievance to be analyzed.
- Analysis of complaint/grievance: within the same timeframe, the complaint or grievance will be assessed for being within the scope of this Policy, considering the type of complaint/grievance, and for whether it is founded/not founded on evidence.

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- Closure or resolution of complaint/grievance: feedback on the outcome and any updates on the timeframe for resolution of the complaint/grievance will be provided to all interested parties.

g) Aleks Metal Rafineri will ensure that all communications and acceptance or non-acceptance of responses are recorded in a unique case folder and tracked through its resolution.

7 External References

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Supplement on Gold, third edition 2016
- OECD Due Diligence Guidance Annex II and the described grievance mechanism
- UN Guiding Principles on Business and Human Rights, 2011
- LBMA Responsible Gold Guidance, v9 November 2021
- LBMA Responsible Silver Guidance, v2 November 2023
- Responsible Jewellery Council – Code of Practice Standards Guidance, 2024
- Responsible Jewellery Council – Chain of Custody Standards Guidance, 2024
- The World Gold Council Conflict Free Gold Standard, 2012
- The Conflict-Free Sourcing Initiative: Five Practical Steps for Conflict Minerals Due Diligence and SEC Disclosure, version 3.0 April 2017

8 Incident Report Guidance

Any collaborator, contractor, customer, and/or third party wishing to raise any complaint and/or grievances related to the activities or impacts of the company or its contractors shall conform to this reporting guidance.

8.a Types of Risks That Can Be Reported

This guidance is particularly useful for stakeholders on the ground who want to inform Aleks Metal Rafineri of risks and behaviors that do not comply with the law or Company Regulations.

8.b Anonymity- Whistleblowing

The name of the reporting person does not need to be disclosed if anonymity is necessary for privacy or protection. However, a minimum level of information and supporting evidence is required to substantiate any claim.

A whistleblower report should include the following details:

- Names of the individuals involved
- Dates, times, and locations of the incidents
- Description of the misconduct, including specific actions, decisions, or communications
- The impact of the misconduct

The legal framework for whistleblowing in Switzerland is based on labor law, data protection

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law, and criminal law, weighing the interests involved.

Commitment to Compliance

As a company and employer, **Aleks Metal Rafineri (AMR)** is committed to fairness, legality, and sustainability in the precious metals industry. We uphold the highest ethical standards in our relationships with employees, customers, and suppliers. Compliance with all legal requirements, supply chain due diligence principles, and internal policies is of utmost importance to us. Any violations could result in the termination of business relationships or legal disputes, potentially damaging the company's reputation.

AMR and its employees are dedicated to full compliance with all applicable laws and regulations, particularly regarding the supply chain due diligence for gold, silver, platinum, palladium, and rhodium. We recognize that the refining and trading of precious metals can be linked to risks such as financing armed conflicts, human rights violations, forced or child labor, corruption, and money laundering. More details on this subject can be found in the OECD Due Diligence Guidance Annex II and the grievance mechanism described in our download area. Understanding the origin and extraction of the precious metals we process is our obligation.

Compliance Measures

We ensure adherence to legal and internal requirements through:

- **Organizational measures** (e.g., dual control principle, internal processes, and policies)
- **Prevention efforts** (e.g., employee training, audits)
- **Control mechanisms** (e.g., internal audits)
- **Sanctions** for non-compliance

Encouraging Whistleblowing

We encourage employees, customers, suppliers, prospective partners, and other stakeholders to support us by reporting any concerns or relevant information. Your input helps us enhance our processes and policies. Every report will be reviewed, and appropriate measures will be taken.

Reports can be submitted anonymously via:

Email: compliance.hotline@aleksmetal.com

Phone & SMS & Whatsapp: +90 532 232 5812

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

Address:

Aleks Metal Rafineri (AMR)

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

External Whistleblowing Options

In addition to our internal reporting channels, you may also report concerns to external authorities:

- **Republic of Turkey FinancialCrime Authority :**

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Web: <https://en.hmb.gov.tr/fcib-presentation>

e-mail: anket@masak.gov.tr

Phone: 0 (312) 204 60 00

8.c Evidence

Evidence and detailed information must be provided whenever possible, including at least:

- Name of affected person, community, and/or organization
- Description of facts
- Witnesses
- Date
- Time
- Location of relevant events
- Identity of buyers of minerals from the stated location (if known)

8.d Stakeholders Informed

Information should be provided regarding which actors, beyond **AMR**, have been informed about the incident.

Select relevant actor/s	Email, phone number, physical address	Information on response received from actor/s
☐ Local Authority		
☐ Provincial Authority		
☐ National Authority		
☐ Ministry / Department		
☐ Local civil society organisation/NGO		
☐ Intl civil society organisation/NGO		
☐ International Organisation		

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Select relevant actor/s	Email, phone number, physical address	Information on response received from actor/s
☐ Police or antifraud brigades		
☐ Prosecutors		
☐ Lawyers		
☐ Member of Parliament		
☐ Media		
☐ Other (please specify)		

This section ensures that **AMR** can track the response from relevant stakeholders and take necessary actions.

8.e NGO Reports

NGOs that have produced reports related to incidents occurring within **AMR's** supply chain should provide the following information:

- **A clear research methodology**, including:
 - ✓ The precise location where the research was conducted
 - ✓ The identities of interviewed individuals (anonymous or otherwise)
 - ✓ The researcher's educational background and professional experience at the time of conducting the research
- **Clear and accurate referencing**, including:
 - ✓ Citation of all sources (individuals, radio, reports, media, documents, other) with precise dates (and times where relevant)
 - ✓ A diverse range of sources to support allegations. If source protection is necessary, a coding system should be used to refer to sources. This helps demonstrate the diversity of stakeholders interviewed and ensures that findings are not based on just a few sources.

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- **Victim perspectives** should be included where possible, ensuring vulnerable interviewees are protected.
- **Supply chain linkages**, including:
 - ✓ Information establishing a connection between the incident and supply chain actors.
 - ✓ If the incident occurred at a mining site, details of traders and exporters buying from the miners should be provided.
 - ✓ If miners are part of a cooperative, the cooperative's name should be specified.

This information will help **AMR** use its influence to ensure proper remediation, protect victims, and provide compensation where necessary.

The last review date of the **AMR Grievances and Whistleblowing Policy** by the Compliance and Board of Directors is **January 12, 2024**. It has been updated as the **PL.021-v4 version file**.