ALEKS
METAL RAFİNERİ

ALEKS Metal Rafineri Anonim Şirketi

Responsible Precious Metals Due Diligence Report

Purpose

This Responsible Supply Chain Compliance Report has been prepared in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Annex II), which is based on the recommendations of the Financial Action Task Force (FATF).

The purpose of this Report is to outline the high standards established by ALEKS Metal Refinery Joint Stock Company (hereinafter referred to as "the Company" or "ALEKS") for:

- combating systematic and widespread human rights abuses,
- avoiding business relationships or transactions with entities that contribute to the financing of regional conflicts or terrorism,
- and preventing money laundering and the financing of terrorism.

This Report has been prepared in accordance with the OECD's Guidance to support the Company's efforts to identify, assess, and mitigate supply chain risks and to ensure responsible sourcing of gold and other precious metals.

ALEKS Metal Refinery Anonim Şirketi has developed its Responsible Precious Metals Supply Chain Policy in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

This Report provides an analysis of ALEKS's operations and practices in line with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Precious Metals.

COMPANY INFORMATION	
Company Name	ALEKS Metal Rafineri A.Ş.
Address	Ikıtellı Osb Mahallesı Marmara, P Blok No:11, 34307 KUCUKCEKMECE ISTANBUL
Reporting Period	1 January – 31 December 2024
Report Date	15 January 2025
Responsible Senior Executive	Sarp Tarhanacı / Chairman of the Board
Phoen Number	+90 212 448 66 00
Website	www.aleksmetal.com

In this Report, prepared under the framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Precious Metals, ALEKS outlines its efforts to identify and mitigate supply chain risks, establish robust internal management systems, and ensure third-party verification of compliance processes.

The Report provides detailed explanations regarding the "Five-Step Framework" described in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, which includes:

Step I: Establish strong company management systems
Step II: Identify and assess risks in the supply chain
Step III: Design and implement a strategy to respond to identified risks
Step IV: Arrange for independent third-party audits of supply chain due diligence at refiners and intermediaries (Independent Assurance Report)
Step V: Publicly report on supply chain due diligence annually

Step 1: Internal Management System

Aleks Metal Rafineri A.Ş, operating in the precious metals recovery sector, declares—consistent with its Company Policy—its commitment to managing and developing its activities with constant attention and continuous improvement regarding the quality of its products/services, employee protection, environmental safeguarding, and care for the community.

Aleks Metal Rafineri A.Ş has implemented a corporate management system, described in specific manuals and procedural codes, outlining its approach to anti-money laundering, countering the financing of terrorism, and ethics through the development of a Code of Conduct and procedures on responsible sourcing. These follow the RJC Code of Practices (2019) and RJC Chain of Custody (2017), aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Roles and responsibilities are clearly defined and shared with stakeholders. Responsible teams are regularly updated on legal changes. The system includes documented supports, and counterparties are informed of the company's General Policy and asked to share its principles. Each refining order is monitored for traceability.

Compliance Statement:
We are in full compliance with Step I – Establish Strong Company Management Systems.

Compliance Indicator:
To establish a robust company management system, ALEKS has adopted and implemented a corporate policy fully aligned with:

- The recommendations of the Financial Action Task Force (FATF),
- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas,
- Guidance on Responsible Supply Chains of Precious Metals,
- United Nations Security Council Resolutions,
- European Union Regulations, and
- Regulations of MASAK (Financial Crimes Investigation Board of Türkiye).

A comprehensive risk-based assessment has been conducted. In accordance with our Responsible Precious Metals Supply Chain Policy, ALEKS has: Operated and monitored all supply chain processes, Implemented controls and traceability procedures, Analyzed and evaluated potential risks, Applied rigorous Know Your Customer (KYC) principles, And ultimately, established a strong and fully compliant internal management system.

Step 2: Identification and Risk Assessment in the Supply Chain

Risk identification follows OECD Due Diligence Guidance indicators. Aleks Metal Rafineri A.Ş has set an operational process to gather supply chain information. After evaluating the collected information and documents, the organization qualifies counterparties to engage in transactions.

A specific questionnaire is sent to all counterparties (clients or suppliers) providing materials. Together with the questionnaire, the company's Policy and attachments are sent, and counterparties are requested to agree to its principles. The responsible function informs management of the outcome.

Information sources include federal or cantonal authorities, CMP, specialized databases, international lists (World-Check, EU sanctions, OFAC SDN), EU business registers.

Compliance Statement:
We are in full compliance with Step II Identification and Risk Assessment in the Supply Chain

Compliance Indicator:
Within the framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Precious Metals, ALEKS has developed and implemented a Precious Metals Supply Chain Policy.

As part of this policy, under the section titled "High-Risk Criteria in the Precious Metals Supply Chain", ALEKS has conducted enhanced due diligence activities to address identified risks. These efforts include the collection of intelligence specific to potential customers, as well as the use of differentiated questionnaires and other information-gathering tools tailored to individuals, corporations, and companies operating in the precious metals and related sectors.

Intelligence and background checks on customers are regularly updated at scheduled intervals. In exceptional cases, additional documents or clarification are requested. These processes have been integrated into a systematic customer relationship management structure, where all interview notes, supporting documents, and communications — from the first contact with a customer to the current status — are digitally archived, forming a comprehensive and cumulative database.

Each customer or supplier is assigned a unique reference account number within this system. Based on this, both the onboarding/rejection decision-making process and, where applicable, all subsequent commercial activities are monitored and analyzed systematically.

Step 3: Implementation of a Risk Management System

If news, information, or critical evaluations suggest illicit involvement, internal procedures are activated. Between January and December 2024, one high-risk relationship was identified and reported to MASAK (Money Laundering Reporting Office Turkey) Another high-risk transaction triggered enhanced due diligence, after which satisfactory clarifications were obtained, and the transaction was authorized.

All personnel are aware of the importance of reporting any suspicious transactions to management.

Compliance Statement:
We are in full compliance with Step III Implementation of a Risk Management System

Compliance Indicator:

Implementation of Know Your Client (KYC) Principles

ALEKS maintains records of all communication notes, risk assessments, and Know Your Client (KYC) documentation for each of its customers and suppliers, organized by unique **Customer Account Numbers**. All related documents are securely stored on encrypted cloud-based infrastructure.

The company's internal system enables transaction monitoring on a client-by-client basis. Depending on the level of risk identified, the **Risk Committee** may take decisions such as account deactivation, freezing, or blacklisting.

Appointment, Role, and Reporting of Compliance Officers

ALEKS' s compliance officers are responsible for implementing the company's **Precious Metals Supply Chain Policy**, which was prepared in accordance with the **OECD Responsible Precious Metals Supply Chain Compliance Guidance**.

To monitor compliance activities and oversee the client onboarding and rejection process, the company resolved on **January 02, 2024**, to establish a **Risk Committee**. At that time, the initial members of the Committee were appointed and tasked with drafting the internal regulation that would govern its authority and responsibilities.

Following its establishment, the Risk Committee implemented the following key initiatives:

- Drafted and obtained Board approval for the **Risk Committee Regulation**, defining its roles and powers.
- Prepared the **Responsible Precious Metals Supply Chain Policy** and submitted it for Board approval.
- Created and formalized the **Customer Onboarding and Risk Assessment Policy**, also approved by the Board.
- Instructed a full review of existing business relationships in accordance with the new policies and took appropriate action on whether to maintain or terminate such engagements.

To ensure transparency and allow the sharing of findings, concerns, and unexpected risks, the company established the dedicated compliance email address **compliance@aleksmetal.com**. The Risk Committee is responsible for monitoring incoming communications and taking action as necessary.

Step 4: Third-Party Audit of Due Diligence

Aleks Metal Rafineri A.Ş is Member RJC; its Due Diligence processes are regularly verified. By the end of May 2025, the RJC-COP &C0C certification initial is planned, confirming the Due Diligence process in the supply chain.

Compliance Statement:
We are in full compliance with Step IV Third-Party Audit of Due Diligence

Compliance Indicator:
Within the framework of our company's Precious Metals Supply Chain Policy, which has been prepared in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an agreement has been made with the independent audit firm Görüş Bağımsız denetim ve Yeminli Mali Müşavirlik Anonim Şirketi to carry out a compliance assessment.

The resulting Independent Assurance Report will be published on ALEKS's official website at:
https://www.aleksmetal.com/compliance

Step 5: Report on Supply Chain Due Diligence

This is the first structured report in this format and will be supplemented in future revisions with additional data and comments. During the observation period, no high-risk transactions were detected per the OECD Due Diligence Guidance, and no transactions were conducted with mines or unverified/unqualified counterparties.

Compliance Statement:
We are in full compliance with Step V Report on Supply Chain Due Diligence

Compliance Indicator:
ALEKS prepares an annual Responsible Precious Metals Supply Chain Compliance Report to inform the public about its efforts to assess the current level of compliance within its responsible supply chain. This report is published on the company's official website

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Conclusion and Compliance Statement

The operations carried out by **ALEKS Metal Refinery Joint Stock Company**, in its capacity as a precious metals refinery, have been conducted in full alignment with the **Five-Step Framework** outlined in the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**.

For the period **1 January 2024 – 31 December 2024**, no significant control deficiencies or regulatory non-compliance were identified by the Company's internal control units regarding the Company's precious metals operations.

Declaration of Compliance with the OECD Five-Step Framework	
Step I: Establish strong company management systems	**YES**
Step II: Design and implement a strategy to respond to identified risks	**YES**
Step III : Belirlenen risklere yanıt verebilecek bir stratejinin tasarlanması ve uygulanması	**YES**
Step IV : Arrange for independent third-party audit of due diligence practices (Independent Assurance Report)	**YES**
Step V : Report annually on supply chain due diligence	**YES**
Overall Compliance Statement	**YES**

Senior Management Compliance Declaration

The operational procedures of our Company are in full compliance with our **Precious Metals Supply Chain Policy**, which has been prepared in accordance with the **OECD Due Diligence Guidance**. We have established a robust internal management system to identify and mitigate risks in the supply chain and to ensure that our due diligence processes are subject to independent third-party assurance.

We are fully committed not only to improving and strengthening our own compliance practices but also to raising awareness and fostering a culture of responsible sourcing among our suppliers and customers within the supply chain.

ALEKS Metal Refineri A.Ş.

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Sarp TARHANACI 15/01/2025

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