



Gold & Silver
Compliance Report

Year 2022

NADİR METAL RAFİNERİ

nadirmetal.com.tr

The London Bullion Market Association's ("LBMA") Responsible Gold Guidance ("RGG") and Responsible Silver Guidance ("RSG") have been established for Good Delivery Refiners to adopt high standards of due diligence to combat systematic or widespread abuses of human rights, to avoid contributing to conflict, to comply with anti-money laundering and combating terrorist financing practices and addressing environmental, social and governance responsibilities.

Nadir Metal Rafineri ("Nadir Metal"), the foundations of which were laid in 1967, has been operating in the precious metals sector for more than 50 years. The main fields of activity of our company are refining, recycling, laboratory services, production of gold and silver bars bearing the "Nadir Metal" and "Nadir Gold" brands, and trading of precious metals. Nadir Metal is on the LBMA Good Delivery List since 2011 for gold, and 2012 for silver. Furthermore, member of the Singapore Bullion Market Association (SBMA), Shanghai International Gold Exchange (SGEI), "Approved Brand" at COMEX, and an accredited refinery for gold and silver at Borsa Istanbul.

Nadir Metal recognizes the risks which may be associated with extracting, handling, transporting, producing, and trading precious metals, especially from conflict-affected and high-risk areas. Nadir Metal commits to refraining from any action which contributes to conflict and terrorist financing activities, money laundering, corruption, and abuses of human rights and to comply with relevant sanctions. Furthermore, we commit to meeting national and international responsibilities related to sustainability; environment, social, and governance.

This report summarizes how Nadir Metal Rafineri Sanayi ve Ticaret Anonim Şirketi ("Nadir Metal") has complied with the requirements of the OECD's Due Diligence Guidance for Responsible Supply Chains, **LBMA Responsible Gold Guidance Version 9, LBMA Responsible Silver Guidance Version 1** for the Year 2022.

Refiner's details	
Refiner's name:	Nadir Metal Rafineri San.ve Tic A.Ş.
Location:	Istanbul Vizyonpark Genel Merkez Plaza Yenibosna Merkez Mahallesi Kuyumcular Sokak No: 4 İç Kapı No: 1101, Bahçelievler /İstanbul Turkey Phone number: +90 212 886 6729
Scope of Assurance	Gold & Silver
Reporting year-end:	December 31, 2022
Date of report:	February15, 2022
Senior Management responsible for this report:	Abdullah TÜTÜNCÜ, Chairman,

TABLE 1: Summary of Activities Undertaken to Demonstrate Compliance

Step 1: Company Management Systems

Compliance Statement with Requirement:

We have fully complied with Step 1: Establish strong management systems as detailed below:

1.1 Has the Refiner adopted a supply chain policy regarding due diligence for the supply chain of gold and silver?

Comments and Demonstration of Compliance:

Nadir Metal is consciously aware of its responsibility for the risks associated with all adverse impacts arising from the extraction, trade, transport, and export of precious metals from Conflict and High-Risk Areas (CAHRA). Nadir Metal conducts its business by ensuring that precious metals have not directly or indirectly contributed to human rights abuses, terrorist financing activities, conflict, irrecoverable environmental retrogression, corruption, and money laundering.

Ever since the board of directors resolution in 2012, our Responsible Sourcing Company Policy, (hereinafter “Company Policy”) is fully in force in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas according to the model set out in Annex II and The London Bullion Market Association’s Responsible Sourcing Guidances for gold and silver. This sets out, in particular, Nadir Metal's responsibility to establish strong company management systems to perform risk-based due diligence over its precious metals suppliers, sub-suppliers, and customers (hereinafter, “counterparty” or “counterparties”), precious metal supply chain and monitoring of transactions.

In this context, Nadir Metal confirms that its Company Policy complies with LBMA Responsible Gold Guidance V9, Responsible Silver Guidance V1 and that the Policy includes all threat financing risks, including OECD Annex II risks, per Step 1.1 of the Responsible Gold/Silver Guidances (RGG/RSG) and environmental, social, and governance (ESG) factors considered in its gold/silver primary supply chains. Furthermore, the Company Policy includes detailed and meaningful know-your-counterparty, supply chain due diligence, transaction monitoring processes, criteria for high-risk supply chains, record maintenance, and an employee training program. It has a company-wide validation for the gold/silver supply chain.

Our Company Policy is reviewed annually by Legal&Compliance Unit, updated as necessary, reviewed, and approved at a senior level by the Board Resolution. Company Policy was revised in 2022 to comply with the requirements made by LBMA Responsible Gold Guidance (“RGG”) version 9, dated November 2021. To be specific, zero tolerance principles are specified, and the criteria for high-risk supply chains have been detailed by categorizing them based on country, supplier, and material type. The flow and format of the policy have been updated in a stakeholder-friendly way. In-house training was given to relevant staff regarding the new version that has been published on our website for all our stakeholders. Our Company Policy V7 is publicly available on our website, both in Turkish and English: <https://www.nadirmetal.com.tr/wp-content/uploads/2022/10/NMR-STZ-Policy-EN-v7.pdf>



Even though the Company Policy is incorporated with various company policy commitments, it is not a stand-alone document, various company documents include sufficient details on the gold/silver supply chain, such as AML/CFT Policy, Anti-Bribery, and Anti-Corruption Policy, Human Rights Policy, Whistleblowing Policy. Besides them, "Donations and Aid Policy" and "Stakeholder Engagement" have been published in 2022. These policies align with Company Policy, and Nadir Metal's activities, including sustainability (environment, social, governance), combating systemic or pervasive human rights violations, and avoiding and contributing to conflicts, to meet the requirements and expectations of stakeholders in 2022. Hence, Nadir Metal publishes its Sustainability Reports every year. Moreover, as an internal document, our staff regulation has been revised and detailed accordingly Human Rights Policy's headlines in 2022.

Nadir Metal has all the legally required permissions and certificates including Environmental Impact Assessment Positive Report, ISO 9001: 2015 Quality Management, ISO 14001: 2015 Environmental Management, and ISO 45001:2018 Occupational Health and Safety which have been revised in 2022.

1.2. Has the Refiner set up an internal management structure to support supply chain due diligence?

Comments and Demonstration of Compliance:

Nadir Metal has set up an internal management structure to provide effective oversight of the implementation and continuous improvement of the supply chain due diligence program, to process and developed it according to the needs and requirements, to meet the Company Policy in its organisational structure. By Nadir Metal's organisational structure, the tasks, responsibilities, and authorities of the relevant persons who are responsible for the implementation of policies and procedures of due diligence, monitoring, controlling, risk management, communication, and internal audit have been defined clearly.

The Board of Directors ("Board") of Nadir Metal has full authority and is responsible for the accountability of the responsible sourcing program. The Board of Directors has the required competence, knowledge, and experience in this context to carry out controlling and risk management activities effectively. The necessary training, presentations, and reports have been provided to the Board and the CEO regarding Responsible Sourcing during the year 2022 by the Compliance Risk Committee (hereinafter "Committee") and the Compliance Officer.

The Board Resolution in 2012 established a Committee to support supply chain risk management activities in the scope of supply chain due diligence. This Committee is responsible for evaluating the risks, business relationships, and transactions regarding the high-risk level determined by the Compliance Officer. The ultimate decision about a future or existing business relationship is taken by the Committee, which is supported by external lawyers, who have knowledge and experience in the responsible supply chain due diligence and precious metal market, since 2014.

Equipped with the necessary skills and competence the Compliance Officer is responsible for providing independent oversight, supervising and reviewing the overall procedures, and implementations of the supply chain due diligence processes, determining its current status and level of compliance, and supporting the day-to-day execution. The compliance officer's duties and responsibilities have been stated with a board resolution. She/he has a direct line to the Chief Executive Officer ("CEO") and is supported by internal legal counsels under the Legal & Compliance Unit, external counsels if necessary to fulfill her/his duties.



Any high-risk issues in the supply chain are reported to the Committee by the Compliance Officer for further decision. The Committee evaluates the strong possibilities or existence of facts mentioned under 'Criteria's About High-Risk Precious Metals Supply Chains' within the Company Policy.

The Compliance Officer submits monthly-prepared reports, which consist of information on due diligence of new suppliers/customers, internal controls, counterparty, and transaction-based risk assessments directly to the CEO and the Board of Directors. The CEO and the Board of Directors retain the ultimate control and responsibility for the precious metals supply chain.

To build up and strengthen capacity, training activities are conducted for employees under the supervision of the Compliance Officer. The Compliance Officer is responsible for the yearly planning and supervising internal and external training with the approval of the CEO and Board of Directors.

Relevant employees attend the training on supply chain due diligence matters. Participants and their numbers may differ depending on the topics according to their tasks and responsibilities. 100% participation of all responsible employees attended the training. In 2022, the mandatory training activities have been conducted in the scope of the OECD's Due Diligence Guidance for Responsible Supply Chains, LBMA's RGG V.9 & RSG V.1 Guidances, Borsa İstanbul regulations, the obligations under AML/CFT Legislation, updated company policies and "KYC" forms, case studies. Considering the total employees, of %60 have received training regarding the Responsible Sourcing Program, the revisions of the AML/CFT Policy, Anti-Bribery, and Anti-Corruption Policy.

Nadir Metal, ensures that payments for purchases of precious metals are made through official banking channels. Due to Turkish regulations if a company is not exempted any cash payments above 7.000-TL (roughly \$350) must go through banking channels and Nadir Metal Rafineri is not an exempted company. Any cash payments up to 7.000-TL to be made to Nadir Metal may only be made where such payment is approved by the CEO and payment information is reliable and verifiable. According to regulation, records of necessary information and documentation are stored for 8 years.

1.3.Has the Refiner established a traceability system over gold/silver supply chains, including chain of custody mapping and identification of supply chain actors?

Comments and Demonstration of Compliance:

Since Nadir Metal conducts a risk-based approach to identify all counterparties by adopting a traceability system over the gold/silver supply chain, it has established a system of controls for visibility and transparency. Nadir Metal has a traceability program where it conducts appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship. The traceability program, which fulfills the LBMA RGG V.9 and RSG V.1 requirement, provides screening, monitoring, controlling, and maintaining records of transactions. The compliance departments carry out controlling activities over the program and database to ensure data integrity. The traceability system is upgraded periodically according to national/international regulations' requirements or detections of the internal auditor or any necessities.

According to Nadir Metal's procedures; specific and relevant documents must be received and verified, and client profiling must be completed and approved before any business relationship is initiated.



The Compliance Officer is responsible to carry out controlling activities according to Nadir Metal's "Risk Assessment Manuel" for the due diligence of the supply chain. Nadir Metal collects and stores all necessary information and documents in the scope of "Due diligence & KYC procedures" at its archive program.

In the scope of KYC procedures, the required information and documents are being received and the counterparty profiling is being completed at the CRM system. The Compliance Officer carries out controlling activities; checking KYC documentation, screening the sanctions (world check), and on-desk research. After the risk assessment process and acceptance of the supplier, the country list of origin, and the type of precious metals are entered into the traceability program by the Compliance Officer.

The traceability program begins with a reference number given to the counterparty and is structured as counterparty's IDs and lot details for each transaction, including information on the date, bill of conveyance or invoice, weight/ type/ the origin of precious metal, results of analyses, date of arrival and delivery, airwaybills, etc. Information and documents are collected and stored in the traceability system for acceptance of the goods.

The Compliance Officer applies necessary actions against the incidents that can occur in the traceability system over the supply chain according to the procedures in the Risk Assessment Manuel. As mentioned above, Risk Assessment Manuel is in a place where all relevant compliance, controlling, and risk management procedures with workflows, responsible persons/units; due diligence & KYC toolkits, relevant forms, declarations, and risk assessment processes have been detailed.

The Risk Assessment Manuel and due diligence procedures, KYC forms&toolkits and the declaration (which is required to be signed by the gold /silver supplying counterparties) have been updated accordingly with our Company Policies of Responsible Sourcing in 2022. KYC forms have been detailed with sub-heading questions of AML/CFT and anti-bribery and anti-corruption regulations. In 2022, deficiencies of 14 potential suppliers and customers' KYC forms and documentation could not be completed and no business relationship has been initiated.

1.4.Has the Refiner strengthened company engagement with gold/silver-supplying counterparties, and, where possible, assisted gold/silver-supplying counterparties in building due diligence capabilities?

Comments and Demonstration of Compliance:

Nadir Metal cares to build long-term relationships based on trust and mutual recognition with counterparties. Nadir Metal has strengthened company engagement with gold/silver-supplying counterparties, and where possible assist them in building their due diligence capabilities to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs, LBMA's Responsible Sourcing Programs, AML/CFT regulatory.

On a general and a minimum basis, Nadir Metal expects the precious metals gold/silver-supplying counterparties to commit to Nadir Metal's Company Policy or their company policy, if any, which should be consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA), according



to the model set out in Annex II. In 2022, we have prepared a stakeholder-friendly document titled "Responsible Supply Chain Principles" in which we explained our expectations and commitments within the scope of a responsible supply chain, in regard to our company policies and conduct of business. As mentioned above, we updated our KYC forms in 2022 and relevant employees have been trained. The updated KYC forms have been sent to prospects, new suppliers, and current suppliers with a risk-based approach, along with our "Responsible Supply Chain Principles" in 2022.

Within the scope of its procedures (such as due diligence procedures, KYC toolkits) and commitments, gold/silver-supplying counterparties are visited on-site and/or remotely if applicable, from time to time for capacity building, as well as risk management by Nadir Metal's competent personnel. Nadir Metal strives to raise awareness on OECD, LBMA responsible supply chain programs, zero tolerance principles, and ESG factors through external training activities to communicate with stakeholders and especially to raise awareness of local precious metals market players and dealers. Nadir Metal shares its expectations with the industry to fulfill its commitments within the scope of responsible supply chain practices.

Nadir Metal modifies its contractual clauses to state that it is expected by the gold/silver supplying counterparties to consider and fully comply with the OECD, LBMA, Borsa Istanbul Responsible Guidances, and regulations. As stipulated above, where appropriate Nadir Metal visits on-site/remotely gold/silver supplying counterparties to build due diligence capabilities, and raise awareness as well as risk management. During the reporting period, Nadir Metal's Compliance Officer and relevant personnel visited 7 gold/silver supplying counterparties on-site where two of them have been local; one mined gold supplier, one recyclable silver supplier, and 5 of them were non-local recyclable gold suppliers.

Nadir Metal is holding yearly external training activities. The training activities have been conducted for Nadir Metal's affiliates and dealers in the scope of company policies' revisions in 2022. Nadir Metal made a presentation regarding, particularly ESG factors, sustainability, responsible supply chains of minerals, and carbon footprint calculations at the "in-person" conference *"Responsible Sourcing, Sustainability, and Climate Change in Gold Mining"* organized by the Turkish Gold Miners Association with World Gold Organization.

Nadir Metal enhanced its activities regarding Gold Banking to bring "under-the-mattress" gold savings into the financial system during the reporting year. In cooperation with the Ministry of Treasury and Finance Türkiye, Nadir Metal developed a software called ATS-TURK, where Turkish citizens can convert their physical gold savings into Turkish Lira or gold accounts at banks through a verified jeweler network. All the due diligence documentation in the scope of the KYC procedure and traceability of the goods are stored within the software.

Nadir Metal takes into consideration the management of business integrity impacts and ethical conduct and supports the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI). Nadir Metal have not entered into any business relationship with a State-Owned Enterprise operating in EITI country.



1.5.Has the Refiner established a company-wide confidential grievance mechanism?

Comments and Demonstration of Compliance:

Nadir Metal considers its stakeholders (employees, counterparties, or any third party) grievances to carry itself further. Nadir Metal has in place a company-wide confidential grievance mechanism, in the scope of ISO 9001: Quality Management, which is a formal complaint process that is made available to stakeholders that are being negatively affected by certain business activities and operations. Additionally, this company-wide confidential grievance mechanism allows stakeholders to voice concerns that violate legislation, the company's ethical principles, policies, and procedures over the precious metals supply chain, or any newly identified risk. Furthermore, stakeholders can express suspicious or potentially illegal or unethical behavior without any retaliation or threat of victimization or harm.

In 2022, Nadir Metal has expanded its Whistleblowing Policy to include all stakeholders and ESG factors and consolidated it with a grievance mechanism. Additionally, the actions/incidents/ crimes that may constitute the subject of the grievance were exemplified. Furthermore, Nadir Metal has established a procedure that is approved by the board resolution, which determines how to manage the whistleblowing and grievances that will come within these scopes.

The Whistleblowing Policy is publicly available at Nadir Metal's website: https://www.nadirmetal.com.tr/wpcontent/uploads/2022/10/NMR_Whistleblower_Policy_EN-G-v3.pdf

Any interested party can express anonymously or not, both individual or collective bases about their concerns or indicate issues related to Nadir Metal's supply chain and associated risks via;

- A dedicated functional mailbox, available at etik@nadirmetal.com.tr / compliance@nadirmetal.com.tr.
- A dedicated address available at İstanbul Vizyonpark Genel Merkez Plaza Yenibosna Merkez Mahallesi Kuyumcular Sokak No:4 İç Kapı No:110 Bahçelievler - İstanbul / Türkiye
- A dedicated address phone number is available at +90 212 886 7330.

All information received in connection with concerns will be treated discreetly, strictly confidential, and as soon as possible. Nearby an email address and a hot phone line dedicated to whistleblowers and complainants. While the Administrative Unit of Nadir Metal deals with internal stakeholder complaints, the Legal&Compliance Unit is responsible for monitoring and assessing all incoming external supply chain and risk-related communications and keeping the CEO and the Board of Directors informed about every newly identified risk. No whistleblowing or grievance notifications have been received in the year 2022.

Step 2: Risk Identification and Assessment

2.1 Does the Refiner have a due diligence process to identify risks in the supply chain?

The due diligence processes related to the identification and early detection of the risks, which may endanger the existence, development, and continuity of Nadir Metal and its supply chain, assessment of identified risks, implementation of necessary measures, and management of risks



are detailed in the written procedures. Before onboarding of any counterparty, Nadir Metal's due diligence process follows its requirements as outlined in its company policies and particularly Risk Assessment Manuel. Risk Assessment Manuel includes mapping the supply chain to identify and assess risks effectively.

The due diligence process is carried out by the Compliance Officer. The Compliance Officer has the required competence, knowledge, and experience, to perform due diligence on the supply chain to determine its current status and level of compliance. In terms of risk assessment **and monitoring activities, the Compliance Officer cooperates with the relevant unit/personnel, and the related information is** provided to them according to necessity and urgency. The system is supported through programs of traceability, CRM, archive, and accounting unit if necessary.

Nadir Metal's due diligence process with a risk-based approach is a requirement before entering in any business relationship. Information and documents are obtained from the counterparty by relevant personnel, regarding the identity of the counterparty, the nature of the potential business, and the origin and form of the precious metal, and conveyed to the compliance officer. Nadir Metal has a comprehensive due diligence process to identify risks in the precious metals supply chain in the observation of main headings "counterparty", "location", and "type of material". A database has been established and a risk profile has been allocated for every counterparty. Nadir Metal has gathered its due diligence process with sub-headings KYC procedures, risk identification, and assessments within its Company Policy and Risk Assessment Manuel.

Nadir Metal has built an effective internal control system for its risk assessment. This allows the Company to carry out follow-up and control activities and to review whether transactions are performed according to applicable legislation, guidelines, corporate policies, procedures, and counterparty risk profiles through a risk-based approach.

Sources of such an integrated assessment include but are not limited to Sanctions lists (US, UK, EU, UN, and relevant sanctions lists), Dodd-Frank s. 1502, EU CAHRA list, Heidelberg Barometer, Fragile States Index or equivalent, UN Human Rights Office of the High Commissioner or equivalent, Reports by the Financial Action Task Force (FATF), credible market intelligence on high-risk gold/silver centers/transit hubs and on countries where there is a high risk of money laundering. As a service provider World-Check is used for screening.

As a result of the risk assessment process, if there is no suspicion or detection of high-risk criteria in the supply chain, Compliance Officer's review is competent to sign off the procedure without any further approval. She/he informs the CEO on a regular basis, while reporting monthly to the Board of Directors. However, if there are high-risk criteria or any situation that could occur a high risk, the Compliance Officer immediately gives information via a written report to the Committee. By the risk assessment of the Committee, it is decided whether to enter into /continue a business relationship with the counterparty or not.



2.2 How does Refiner classify identified risks in light of the standards of its due diligence system?

Nadir Metal's supply chain due diligence system considers the measures required by the LBMA Responsible Sourcing Program before entering into a business relationship with any precious metals counterparty. Nadir Metal's all company policies, procedures, and particularly Risk Assessment Manual, include risk identifications based on counterparty, location, type of material, and subcategories of Mined Gold/Silver, and Recycled Gold/Silver.

Nadir Metal has due diligence processes that include the identification/criteria such as Politically Exposed Persons, beneficial owners, sanctions, and determination of whether precious metals or counterparties are from a CAHRA or are considered high-risk including the threat finance and ESG criteria used for the gold/silver primary supply chain. All transactions of counterparties are monitored and evaluated throughout the business relationship, based on risk criteria defined within the Company Policy, detailed in the Risk Assessment Manual. The Risk Assessment Manual is regularly reviewed, and updated as necessary.

By a comprehensive assessment, a decision is made whether it is zero tolerance or high-risk supply chain or not. Where zero-tolerance issues are identified, Nadir Metal neither enters a business relationship with a gold/silver-supplying counterparty nor continues an existing relationship.

While there were no zero tolerance-related cases in 2022, there are two cases of high risk in our gold and silver supply chains. Both of the cases are identified as PEP and the business relationships are continued under the supervision of the Compliance Risk Committee and Compliance Officer.

2.3 Has the Refiner undertaken EDD measures for identified high-risk supply chains?

Nadir Metal undertakes EDD measures for identified high-risk supply chains. In this context, the Compliance Officer carries out enhanced due diligence for high-risk categories specified in the Risk Assessment Manual, which includes all gold/silver originating or transiting through conflict-affected areas, or areas with possible human rights abuses, child labor, and other high-risk factors.

EDD measures are subject to different assessments for high-risk LSM gold/silver supply chains, high-risk ASM gold/silver supply chains, high-risk Recycled gold/silver from Intermediate Refiners, and high-risk Recycled gold/silver from other sources.

The taken measures in the scope of EDD are conducted appropriately by undertaking an on-site visit (or remotely if applicable) or investigation. Where EDD is triggered, the competent employees or independent third-party consultants, who are free of any conflict of interest with the counterparty, carry out an on-site investigation/visit at the location of the gold/silver origin by using the on-site visit templates of LBMA Toolkit. The on-site visit procedure includes at a minimum but is not limited to, appropriate documented KYC information, threat financing risks, ESG factors, the specific supply chain due diligence findings if necessary consulting relevant internal and external stakeholders. These visits are conducted before any transactions occur or, at the least, within 6 (six) months of the business relationship commencing.



Nadir Metal implements EDD procedures where high-risk Recycled Gold from Intermediate Refinery is detected. The Intermediate Refiner's due diligence processes are conducted on a comply or explain base. According to the due diligence process, it is expected from Intermediate Refiners' conformance with an OECD-aligned responsible sourcing scheme. In this aspect, the assurance should be commissioned by the Intermediate Refiner. Additionally, it is important to clarify the UBO of the Intermediate Refiners. Nadir Metal has not worked with an intermediate refinery in a high-risk supply chain during the reporting period.

Considering Nadir Metal's long-term business and mutual recognition-based approach, no visit was made in 2022 in the scope of EDD. In regards to two high-risk cases of PEP, monthly screening through World-Check, the internet has been conducted and risk assessments have been carried out and reported to the Compliance Risk Committee by the Compliance Officer in 2022.

Step 3: Risk Management

Compliance Statement with Requirement:

We have fully complied with Step 3: Design and implement a management system to respond to identified risks as detailed below.

Does the Refiner have a process to respond to the identified risks by either (i) mitigating the risk while continuing to trade, (ii) mitigating the risk while suspending trade, or (iii) disengagement from the risk?

Comments and Demonstration of Compliance:

Nadir Metal adopted an appreciative risk management procedure, called Risk Assessment Manuel which has been developed in 2022 to meet RGG V.9 & RSG V.1 requirements for possible or identified risks in line with the OECD Due Diligence Guidance. Nadir Metal's management strategy and risk management include risk parameters and consider the risk level of the country of origin, the counterparty, the product, the complexity of the supply chain, the transit country, general transportation routing, sanction lists (UN, UK, US, EU, etc.), the certain risk parameters of the jurisdiction like human rights, and any other relevant information, documentation, and circumstances. The risk management strategy provides Nadir Metal to manage risk through enhanced due diligence and to mitigate and remediate adverse impacts in the precious metal supply chain. Nadir Metal cares about continuously monitoring the adequacy of risk management strategies.

A potential counterparty is evaluated and their risks' assessed before onboarding, likewise, after an acceptance of counterparties. Since the counterparties who initially have not been identified as high-risk earlier may become high-risk afterward within the review of the risk classification or the particular situation of the counterparty. Hence the counterparties and transactions are subject to regular monitoring and risk assessment. At every risk assessment phase, the Compliance Officer applies the same level of risk assessment outlined in Risk Assessment Manuel. If there is a strong possibility or existence of facts that have been mentioned as high risk according to the Company Policy's 'High-Risk Criteria for Precious Metals Supply Chains', it is submitted to the Risk Committee for further evaluation, and the Board of Director is informed by the Compliance Officer. The final decision about the future or existing business relationship is taken by the Compliance Risk Committee. The Risk Committee rejects or terminates or suspends the business relationship or might decide to continue the business relationship by implementing an improvement plan which can be valid for up to 6 months. The



improvement plan has to be composed of measurable objectives to mitigate the associated risks. The Compliance Officer is responsible for monitoring the risk mitigation plan. Once the deadline comes on and the high-risk factors continue, the Compliance Risk Committee might extend the period or might suspend the business relationship until high-risk factors do not exist or might end the business relationship directly.

In 2022, one for gold and one for silver supply chain high-risk cases related to politically exposed persons (PEP) had been identified and submitted to the Risk Committee by the Compliance Officer for evaluation. The Compliance Risk Committee has decided to maintain the relationship on the condition of regular monitoring activities; screening through World-Check and traceability system for transactions. Hence, the Compliance Officer continuously monitors the related cases and reports to the Compliance Risk Committee, as well as monthly bases compliance reports to the CEO and the Board of Directors.

There are no instances where we disengaged with counterparties and there are no cases of cooperation with national or local government authorities.

Step 4: Arrange for an independent third-party audit of the supply chain due diligence

Compliance Statement with Requirement:

We have fully complied with Step 4: Arrange for an independent third-party audit of the supply chain due diligence.

Comments and Demonstration of Compliance:

Nadir Metal selected an Assurance Provider from the LBMA's Approved Service Providers List. Hereby, Nadir Metal engaged the services of the assurance provider PKF Istanbul and their independent reasonable assurance report can be viewed on Nadir Metal's web page, www.nadirmetal.com.tr. The Board of Directors has fulfilled its responsibility to ensure Assurance Provider by the International Standard on Assurance Engagements (ISAE3000).

There are neither high and medium-risk non-conformances identified during the current audit cycle nor the progress on high/medium-risk non-conformances identified in the previous audit cycle remains to be mitigated nor compliance reasons when partial high/medium-risk non-compliances have been raised.

Step 5: Report on supply chain due diligence

Compliance Statement with Requirement:

We have fully complied with Step 5: Report on supply chain due diligence

Comments and Demonstration of Compliance:

Further information and specific details of how Nadir Metal's systems, procedures, processes, and controls have been implemented to align with the specific requirements of the LBMA Responsible Gold Guidance Version 9 and Responsible Silver Guidance Version 1 have been set out in our gold/silver supply chain policy, compliance report, and independent third party audit report which are publicly available on Nadir Metal's website, www.nadirmetal.com.tr



Management Conclusion

Is the Refiner in compliance with the requirements of the LBMA Responsible Gold/Silver Guidance for the reporting period?

Yes.

In conclusion, Nadir Metal implemented effective management systems, procedures, processes, and practices to conform to the requirements of the LBMA RGG V9 & RSG V1 as explained above for the reporting year ended December 31, 2022

Nadir Metal is committed to ensuring its social, sustainable responsibilities and regulatory requirements and will continue to review and update its internal controls on an ongoing basis.

Other Report Comments

If users of this report wish to provide any feedback to Nadir Metal Rafineri with respect to this report, they can contact us by emailing etik@nadirmetal.com.tr and/or compliance@nadirmetal.com.tr

İstanbul, February 2023

Abdullah Tütüncü, Chairman

NADİR METAL RAFİNERİ SAN. VE TİC. A.Ş.
Yenibosna Merkez Mah. Kuyumcular Sk.
İstanbul Vizyonpark Genel Merkez Plaza
No:4 İç Kapı No: 1101 Bağcılar / İST.
Tel: 0212 603 09 67 - 0212 603 09 73
Marmara Kurumlar V.D.: 027 037 0745