

Sustainability Report 2020



NADİR METAL RAFİNERİ

nadirmetal.com.tr



NADİR METAL RAFİNERİ

Sustainability
Report
2020



“

Reason and intention are good partner;
establish friendship
between them, not misery,
you will be comfortable in life.

Nadir Tütüncü

1936 - 2017

We remember him with love, respect and mercy.

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“ In this process where the economy is struggling, we work together with our stakeholders to further integrate Sustainability into all our ways of doing business.”

INTRODUCTION

Dear Stakeholders,

The year 2020 , which we have spent in the shadow of the COVID -19 pandemic , has been a year where the struggle to keep the health system and the economy functioning has been given while deeply affecting our world . The health crisis caused by the epidemic has also negatively affected the global economy , while restrictions and closures imposed in many countries, such as in our country, have weakened the economy and global trade.

The economic problems inherited by the epidemic and all this together with the shortage of 2019 , this outstanding efforts made to reduce its negative effects as a result of the measures taken in 2020 , too, across all our business lines and we continued in our way unprecedented in such an environment , out stronger from all the challenges we face , we did it in conjunction with our valued stakeholders, our employees and.

By defining the values that we prioritize in sustainability , we have focused on areas such as the environment , people and society, ecosystem management and climate change . We have set long-term goals in the field of sustainability with our concrete goals in these areas . Only from a long-term perspective can we achieve success in combating climate changes that we feel are increasing their impact all over the world.

We have worked together with our stakeholders to further integrate Sustainability into all our ways of doing business during this difficult period of global markets and the economy.

In all circumstances, we continue to develop with awareness of the leading roles and responsibilities that the precious metals sector places on us and with our values.

Chairman of the Board
Abdullah Tütüncü

Sustainability Report 2020



ABOUT THE REPORT

The fifth Sustainability Report 2020, which has been organized, covers the sustainability activities implemented by the Nadir Metal Refinery. It includes the activities, performances, social and environmental responsibilities that it carries out.

The information contained in the Sustainability Report 2020 covers information about the activities carried out between January 1 and Dec 31, 2020 and reflects the performance results.

Having reached the sustainability commitments specified in the Sustainability Report for 2019, Nadir Metal Refinery is leading the precious metals sector with its sustainability performance included in the report in 2020.

Our Sustainability Report 2020, prepared in accordance with our principles of transparency, responsibility and accountability, has been printed in a small number to minimize environmental impacts, and includes a PDF version and reports from past periods at www.nadirmetal.com.tr.

Nadir Metal Refinery, which has been operating with its deep-rooted history and values for more than half a century, continues its efforts to leave a livable world to future generations with its social and environmental responsibility awareness..

CORPORATE PROFILE

VISION

To provide the fastest and most modern service in the Turkish jewelery and mining industries, to be one of the top 10 refineries at the international level, in addition to its leadership at the national level.

MISSION

Becoming one of the national and international leading refineries

- Upholding our values,
- Constantly evolving with new technologies,
- increasing our production capacity with an increasing acceleration,
- Providing precious metal recovery and refining services by reducing our environmental impacts within the scope of sustainability..



VALUES

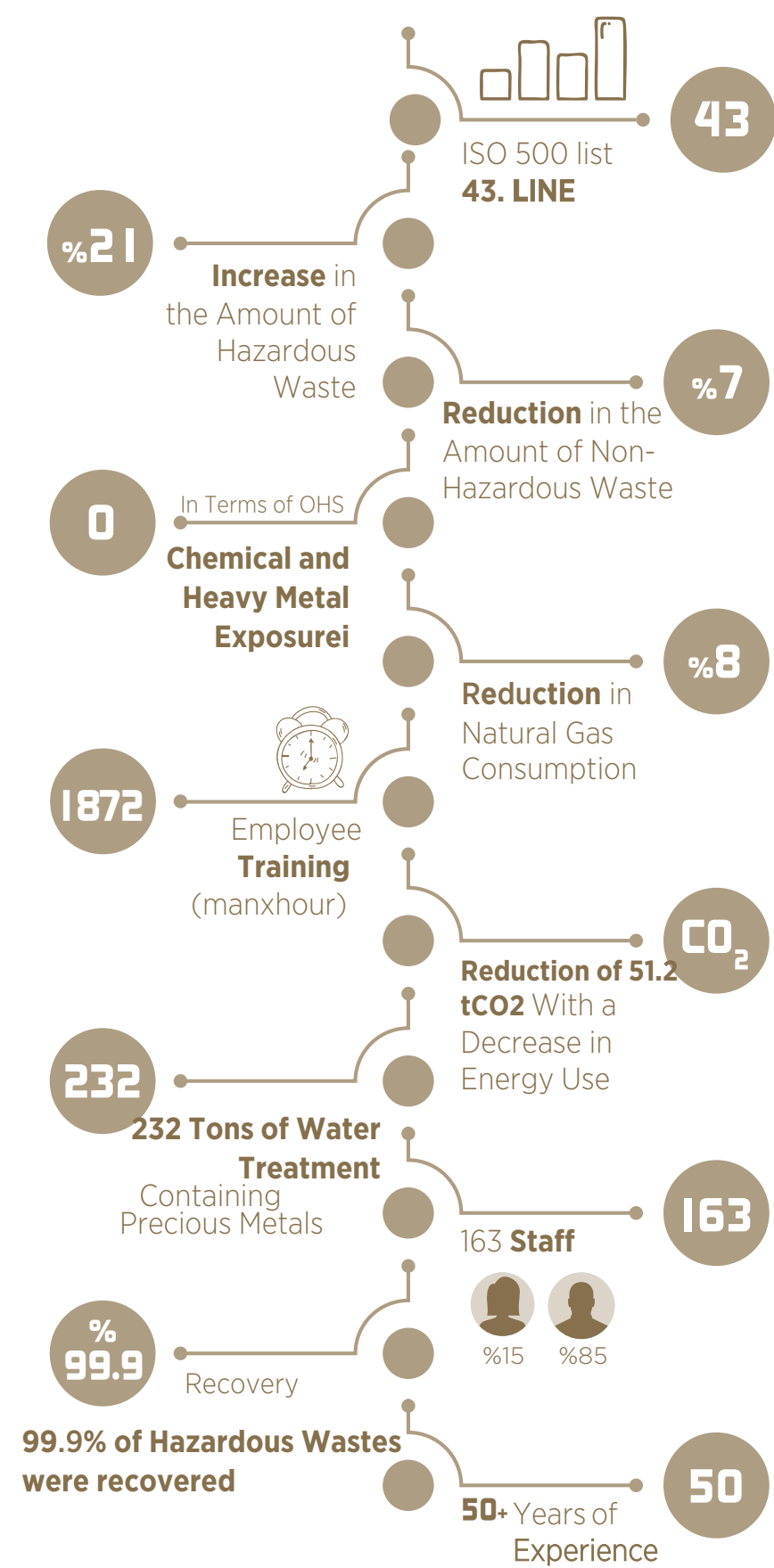


79 Altın Au Gold 196,97	47 Gümüş Ag Silver 107,87	45 Rodyum Rh Rhodium 102,91	78 Platin Pt Platinum 195,08	46 Paladyum Pd Palladium 106,42
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As the first and only company in Turkey accredited in both gold and silver refining at
BIST – Borsa Istanbul, SBMA – Singapore Bullion Market Association and
LBMA – London Bullion Market Association

we produce gold, silver, platinum and palladium by refining precious metals in the highest quality and in accordance with customer requirements.

NADİR IN NUMBERS



NADİR AFFILIITIES



NMGlobal Precious Metals , which started its operations in 2019 , serves corporate and individual customers with a focus on trust and quality . NMGlobal Precious Metals , which is a member of Borsa Istanbul , continues its activities as a stock exchange brokerage firm in the Precious Metals Market.



After the Nadir Metal Refinery was accredited to gold in 2011 and silver LBMA – London Bullion Market Association in 2012 , the work in the European region gained momentum, and at the end of the same year, Rare Gold Italy started its operations.

NADİR GROUP COMPANIES



Established in 2015 to provide services on behalf of integrated waste management , 4R Environment and Energy continues its activities in Tekirdağ , Kapaklı district and provides services with Waste-Derived Fuel Preparation , Intermediate Storage , Packaging Waste and Non-Hazardous Waste Collection Decoupling Facilities.



nadirgold.com, NMR Souvenir , which sells gram gold and silver products branded as “Nadir” with an online sales site, started its activities in 2013 and today has become a reliable source for Internet users who purchase gram gold via the Internet.



The Nadir Currency is the first exchange office in Turkey with ISO 9001 certificate and member No. 076 of the Istanbul Gold Exchange , which started its operations in 1997. It is the first exchange office in Turkey with ISO 9001 certificate . The Nadir Currency , which is constantly increasing the volume of transactions on the Istanbul Stock Exchange, has been among the top dec in gold and silver over the past five years. It sells and distributes the products produced by Nadir Metal throughout Turkey.

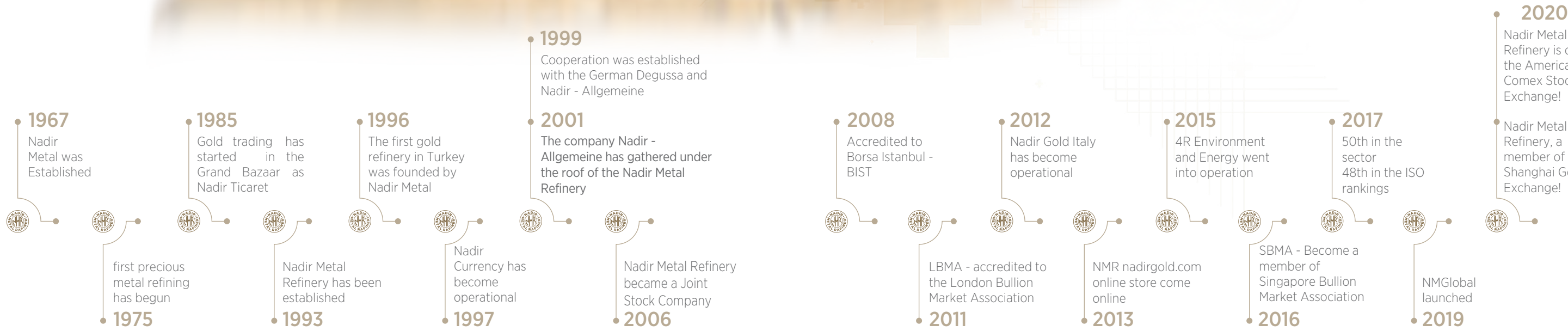
ABOUT NADİR METAL REFINERY

Nadir Metal Refinery, which was started to operate by Nadir Tütüncü in 1967, has been operating in the precious metal business for more than 50 years. Nadir Metal Refinery, which has achieved added value on its way to flawlessness and perfection, is now a global player in a dynamic and ever-evolving world market.

WHAT MAKES GOLD PRECIOUS IS THAT IT'S RARE.

Nadir Metal Refinery , which can process an average of 125 tons of gold, 250 tons of silver and many other precious metals per year, was accredited to Borsa İstanbul in January 2008, gold to LBMA - London Bullion Market Association in December 2011, silver in June 2012 and placed on the "Best Producers " list and became a member of the Singapore Bullion Market Association in 2016.

In addition to refining, ramat, waste acquisition and laboratory services, it manufactures, trades precious metals (gold , silver , platinum , palladium , rhodium) and produces gram gold, silver and platinum products and special collection products branded "NadirMetal" and "NadirGold".



PRODUCTS

High-level security in international standards

Encryption

High-level security thanks to the encryption technique applied on the product surface with superior technology and knowledge.



Encryption technique of writing , which is applied to any part of the product and can only be seen with the help of a microscopei

Product safety is as important an issue as product quality. Certified gram bars and coins products can be packaged and packaged using hologram and laser printing techniques, and their quality and purity are guaranteed with different security points . Gram bars and coins products in certificates of **international standards** and credit card sizes can be produced in many security criteria such as hologram and encryption technique applied on the surface, match serial number, label hologram, UV printing technique.

“With special safety points on the product surface and the special PVC structure of the certificate, which cannot be opened without deforming, we have prevented counterfeiting and counterfeit product construction..”

Nadir Metal Refinery, which produces products of **international standards**, controls product safety at every stage in all processes, from the process of producing the product to the last ring reached by the product . The slightest negative that will make you doubt the quality of the product will cause the process to start from the very beginning and continue until the perfect result is achieved . For this reason, Rare Metal products are always the products of choice with confidence.



Rainbow hologram technique applied on the logo

Thanks to its high quality and special PVC structure , it is **impossible** to reach the gold in the interior without **breaking** and **damaging the PVC**.

Sertifika ve altın külçe **seri eşleşme numaraları**

Back-end **2D encryption** technique. Product weight and logo variable when moved

OPERATION MAP

Addressing the entire global sunday ,having become a sought -after brand in precious metals with certifications and international accreditations ,Nadir Metal Refinery continues its activities in many countries outside the country with its products and services.

Nadir Gold Italy, which has been established in about 30 countries and Italy on the world sunday, carries out its activities with the aim of providing the best service in the European region.



GOLD BANKING
GOLD COLLECTION DAYS FROM BRANCHES

We kept our totals above 1.5 tons in 2019 at the level of 1.5 tons despite the fact that there was a 2-3-month closed period when we could not operate due to the pandemic process and restrictions.



We have increased our number of experts from 15 in 2019 to 35 in 2020 with the increase of our service quality in banks every year and in parallel with the demand of experts according to the satisfaction of banks, we have increased our number of expert experts from 15 in 2020.

We started collecting gold in banks with 2 banks in 2013, and added another bank to our number of banks, which was 4 in 2019, in 2020, we are continuing our gold collection activities with a total of 5 banks and sixteen banks.

We provide services in 30 different cities and branches per day with a total of 5 banks, including 2 participation banks.

As a result of our dedicated, innovative and solution-oriented efforts, we have achieved a total of 7,000 transactions in branches in 2020 and a total of 42,000 transactions with unconditional customer satisfaction.

In the 8-year process, during the golden days that we organized in all cities of our country, we have been a great support in bringing more than 7.5 tons of gold to the national economy from under the pillow.

We will carry out our plans and activities in this direction every year to make it more efficient than last year, and we will always strive to contribute to the economy of our country by aiming higher and supporting it with all our might.



PRODUCTION

As Nadir Metal Refinery, we produce refined metals from primary and secondary raw material sources, using modern technologies, and in the field of noble metal recovery and refined metal production in waste groups that we are authorized. In our company, implementation and action plans are created in line with the short and long-term targets determined by the Board of Directors on environmental impacts and the measures and action plans to be taken.

Nadir Metal Refinery ;It carries out its production processes by creating added value for the country, generating a minimum amount of non- hazardous waste from hazardous and non- hazardous wastes and recycling processes ,by identifying and internalizing the principles of environmental protection and protecting the quality of life, and by uncompromisingly abiding by the occupational safety rules.

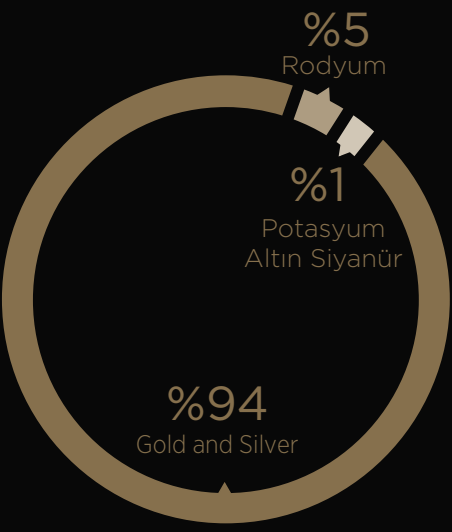
The refining and recovery processes are carried out with chemical metallurgical (hydro, pyro and electrometallurgical) operations in order to create a minimum environmental load. The choice of operation is determined independently of the cost factor, taking into account the environmental load. Refining processes have been established to produce metals with at least 999 % purity by refining processes from gold alloys, silver alloys and noble metal alloys containing high and low silver.

In the recovery processes from wastes and intermediate products from the production of different metals, starting materials are poorer in composition and more complex than metal scraps . Recycling materials generally contain platinum group elements as well as gold and silver. Technologies that will minimize energy use rate, waste water amount , carbon footprint and waste gas amount while maximizing profitability on behalf of our country and company in process determination are determined and applied through continuous R&D studies . In particular , recovery processes from complex and complex waste groups consist of dynamic production processes and the best available technology (BAT) determined by R&D studies is preferred as the application procedure.

Process Distribution in the Production of 2020



Refining Of Gold, Silver From Scrap And Metallic Materials



Nadir Metal Refinery, offers its customers a wide range of products and services.

Au196,97	Ag107,87	Pt195,08	Pd106,42	SPECIAL PRODUCTS	PLATING PRODUCTS
GOLD	SILVER	PLATINUM	PALLADIUM		
Large Bar	Large Bar	Gram Bar	Gram Bar	Gold and Silver Coins	Rodyum Kuruluşlar
Kilo Bar	15 kg			Collectibles	Rodyum Takviyeler
Gram Bar	5 kg			İZEV Collection Gold Series	Potassium Gold Cyanide
Gram Coins	100 oz			Personalized Special Items	
	10 oz				
	Kilo Bar				
	Gram Bar				
	Granular				



ENVIRONMENTAL RESPONSIBILITY

Nadir Metal acts with the awareness that greenhouse gas production and waste generation are inevitable, since precious metal refining and production requires a significant amount of chemical and energy use, despite the development of technological applications and processes..

In all our application areas, we apply an environmental strategy without compromising our basic principles, by using environmental technologies that can be measured and at the technological level of the day, increasing our environmental protection measures, reducing our carbon and water footprint, and the application principles are guaranteed by our company..

As Nadir Metal, we adopt as the basic principle and responsibility to monitor our industrial activities, to minimize the impact on the environment and to manage our environmental impact, to follow the developments at the technological level of the day in all processes and to put them into practice in a short time.



We are working hard for continuous improvement;

Working with emissions lower than the limit values stipulated in the laws and norms and monitoring our emissions, our waste gas and waste water systems have been equipped with continuous control systems in 2020, thus minimizing instantaneous and large-time emissions.

To ensure energy efficiency.
(50% of the heated reactors were replaced with non-heated autogenous reactors in 2020.)

To create economic value as well as reducing waste by recycling all waste groups containing noble metals with the lowest energy and chemical consumption.

Reducing the use of chemicals.
Starting from 2020, our new gas purification and effective cooling systems with large surface areas have been commissioned to reduce the amount of acid vapor (NOx, chlorine gas) formed in the intermediate stages of our processes, and the number of gas washing and oxidation stages has been increased to 5 serial towers. High-capacity reactors with lower chemical consumption were commissioned and the amount of acid consumed per kg of refining was reduced.

Reduction of process gases harmful to the atmosphere.
Our research studies continue within the scope of the principle decision to reduce the amount of NOx formed in chemical gold and silver refining steps by 25% until 2030. In the following years, preliminary studies on the use of alternative chemicals have been completed and trial studies are continuing.

Reducing our waste water amount and ensuring its disposal.
In process steps and recovery processes, pyrometallurgical processes, which have a higher cost and much less waste water production, are primarily preferred instead of hydrometallurgical processes. Our businesses and related units are open to periodic monitoring by local authorities. We regularly report the results of our internal controls and independent controls and measurements made by third parties to the competent authorities. In refining applications, we spend a significant part of our investment and operating expenses not on product acquisition, but on reducing the waste generated during the process of reaching the product, making it harmless to the environment and recycling it. By internalizing this approach and pursuing an environmental policy based on ethical foundations, we desire to be taken as an example by our colleagues in the same lane, both for the environment and for the future of the environment.

ENVIRONMENTAL RESPONSIBILITY

AIR

Emission reduction in production in accordance with the Regulation on Control of Industrial Air Pollution (SKHKKY) (Rev.20.12.2014 dated, 29211 number) published in the Official Gazette dated 03.07.2009 and no. has made all technological investments for the company, and has the measurements of the existing chimneys done every two years and shares them with the Ministry of Environment and Urbanization..

SOIL

In accordance with the relevant provisions of the Environmental Law No. 2872, the “Regulation on Control of Soil Pollution and Point Source Contaminated Fields” (TKKNKKSDY) published in the Official Gazette dated 08.06.2012 and numbered 27605, prevention of soil pollution, determination of areas and sectors where pollution is present or likely to occur. It regulates the technical, administrative procedures and principles regarding the recording, cleaning and monitoring of polluted lands and fields.

Nadir Metal Refinery has fulfilled its duties as required by the regulation, and samples were taken by the company authorized by the Ministry of Environment and Urbanization in terms of soil and groundwater quality of its current field. The Field Sampling Analysis Plan (SÖAP) and the Field Status and Risk Assessment Final Report, which were prepared as a result of the evaluations and submitted to the commission formed by the Provincial Directorate of Environment and Urbanization, were approved and declared as the Site Not Required Tracking. We are committed to maintaining sustainability in this regard.

Water

Nadir Metal Refinery fulfills its obligations by ensuring the treatment of industrial waste water generated as a result of production activities. It has met the discharge limits of the water to be discharged as a result of the treatment, as per the regulation, and received the Discharge Permit Certificate by the General Directorate of Istanbul Water and Sewerage Administration. With the Environmental Permit and License Certificate obtained by the Ministry of Environment and Urbanization in 2017 in the fields of activity of the Recycling of Hazardous and Non-Hazardous Wastes, water pollution has been prevented. In order to ensure sustainability in this regard, it accepts waste water containing precious metals from outside the company and provides the recycling process.

In 2020, Nadir Metal Refinery carried out the treatment of 232 tons of precious metal-containing waste water from the jewelry industry and ramat companies, apart from the waste water generated within the company, after the treatment and disposal of the precious metal in accordance with the standards.

With the modernized systems and increased recycling amount in 2020, approximately 13% cooling water reduction/regeneration was achieved in the process.



WASTE MANAGMENT

Nadir Metal Rafineri, continues to maintain the Zero Waste Principle related to waste management.

1



95% energy savings are achieved by recycling one ton of plastic waste.

2



Only with the energy saved from recycling a metal beverage can, a 100-watt light bulb works for 20 hours.

3



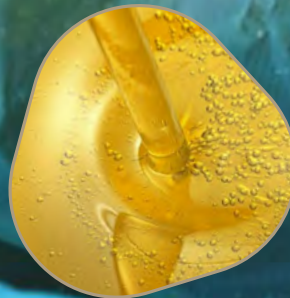
100lt of oil is saved by recycling one ton of glass waste.

4



17 trees are prevented from being cut down by recycling a ton of paper/ cardboard waste.

5



One liter of frying oil pollutes 1 million liters of water. Waste oils contain substances that have a carcinogenic effect. They are dangerous to the environment and human health.

6



Used frying oils can be recovered in the production of biodiesel or for the purpose of electricity generation.

7



When aluminum wastes are recovered , 99% of the pollutant flue gas emissions are reduced.

WASTE MANAGEMENT

In order to reduce the environmental impacts in the selection and implementation of the processes, short and long-term targets are determined and targets are announced to the stakeholders. In the determination of the targets, the application of the Science -Based and realistic implementation principles proposed by the United Nations Conference of the Parties on Climate Change is taken as a basis. Targets are announced annually and comparison tables are prepared with previous years. If progress is made in the reporting year, information is given on the subject.

As Nadir Metal Refinery, for waste management in the production facility, by creating a temporary waste storage area, packaging wastes such as plastic and cardboard are evaluated in our internal processes when technically possible, while in other cases, in order to be recycled in a controlled manner without harming the environment, Ministry of Environment and Urbanization It works with licensed companies authorized by the company and also follows the disposal of our wastes delivered to these companies with the best technology..

Glass packaging materials that emerge as domestic waste are used as slag generators in the recycling process. The use of glass as a dressing agent not only reduces our chemical consumption, but also contributes to the ecologically stable composition of the process slag.

Fabric and paper wastes (cleaning cloths, protective clothing, paper towels, etc.) and metallic process wastes generated within the company are recycled within the company because they contain precious metals. Our wastes that fall into the category of hazardous waste, such as waste oils, contaminated packaging waste, metal scraps, fluorescent lamps, which are released during maintenance operations, are disposed of by licensed companies that we work with on a contractual basis.



The figure above is taken from the integrated environmental information system for the factory location.

Nadir Metal Rafineri, annual wastes from the factory location;

	Waste Type	2019 (kg/year)	2020 (kg/year)	Disposal Method
Dangerous Waste	Fluorescent Lamps	13	31	Storage
	Waste Batteries	1	1	Storage
	Vegetable Waste Oil	150	100	Re-Use
	Contaminated Packaging	561	1790	Recycle
	Waste Sludge	257.208	327.430	Recycle
	Waste Oils	-	-	Recovery
	Spray Cans	15	157	Recycle
	Maintenance Waste Oilsı	5	5	Onsite Recovery
	Contaminated Cloth, Protective Clothing etc.	720	720	Onsite Recovery

	Waste Type	2019 (kg/year)	2020 (kg/year)	Disposal Method
Non-Hazardous Waste	Paper, Cardboard, Plastic	3.529	2.570	Recovery
	Glass	500	500	Recovery
	Refinery Slag	-	-	Recovery
	Solid Waste	30.276	33.756	Disposal
	Metals	20.760	14.000	Recovery
	Powders and Parts Containing Precious Metals	5.289	5.289	Onsite Recovery
	Non-Ferrous Metals	-	-	Recovery



ENERGY MANAGEMENT

Type of Natural Resource	2018	2019	2020
Direct Energy Consumption (Kwh)	3.592.759	3.355.629	3.102.339
Indirect Energy Consumption (Kwh)	3.419.321	3.420.737	4.025.212

In line with its energy management targets, pyrometallurgical applications using electrical energy in precious metal recovery processes, ongoing R&D studies and energy efficient systems are equipped. Materials requiring melting processes were categorized and mass melting application was started instead of small trainings. On the other hand, significant energy savings were achieved from the pre-heating stages by sequentially aligning the melting processes.

In the melting processes using natural gas, the use of oxygen has been increased and the use of natural gas has been reduced by 8% in 2020, both for collection and for unit production, with the optimization of combustion systems. In return for the amount of savings achieved, the amount of carbon dioxide decreased by 51.2 tons of CO2. With the combustion system optimization and uninterrupted melting systems application developed since 2019, the total natural gas savings reached 15% and the total amount of CO2 saved reached 100 tons.



CARBON FOOTPRINT

Since the legal regulation processes in our country have not been completed yet, Nadir Metal is leading the sector with in-house studies . Our evaluations and review processes with non -governmental organizations on carbon pricing studies and carbon credits continue.r.

As the first company in the industry to voluntarily calculate its carbon footprint, we continue to work within the scope of our continuous carbon footprint commitment, which we realized for the first time in 2016.

As Nadir Metal Refinery , we evaluate our impact on climate change as an institution by creating ISO 14064-1 standards and a Greenhouse Gas Management plan, calculating our carbon footprint at the corporate level every year. As a result of this statement and our ongoing work,

Between the years 2019-2020;

Şube-1	Şube-2	Fabrika
The carbon footprint is 13.22 tCO2 in total, with a 53% reduction .	The carbon footprint was realized as 107.36 tCO2 in total and there was a decrease of 7% .	The carbon footprint was calculated as 3383.26 tCO2 in total and an increase of 9% was observed despite all improvement measures.

The increase in the carbon footprint of the factory emerged due to the abnormal increase in the demand for silver bullion due to the market conditions created in line with the pandemic and other economic expectations . Our silver products , which are supplied to the market as water silver in the standard way, especially the kilobar demand originating from abroad, caused a second melting process. In fact, the total energy consumption has increased despite the great energy saving efforts and the implementation of new energy efficient systems procedures in the factory.

When the factory carbon footprint is calculated, it has been determined that the increase is due to the use of electricity . This increase due to market conditions means a 37% decrease compared to 2019 when considered in terms of unit kilogram of product produced.

2019	FACTORY CARBON FOOTPRINT tCO ₂ e	ŞUBE -1 CARBON FOOTPRINT tCO ₂ e	ŞUBE -2 CARBON FOOTPRINT tCO ₂ e	TOTAL
Scope 1	791,75	0,00	0,00	791,75
Scope 2	2232,22	14,16	114,84	2361,22
Scope 3	75,74	14,04	0,00	89,78
Scope 1 + 2 + 3	3099,71	28,2	114,84	3242,75

2020	Factory CARBON FOOTPRINT tCO ₂ e	ŞUBE -1 CARBON FOOTPRINT tCO ₂ e	ŞUBE -2 CARBON FOOTPRINT tCO ₂ e	TOTAL
Scope 1	737,62	0,00	0,00	737,62
Scope 2	2616,08	11,72	107,36	2735,16
Scope 3	29,56	1,49	0,00	31,05
Scope 1 + 2 + 3	3383,26	13,22	107,36	3503,83

Scope 1 Direct Emissions: It consists of natural gas consumption, LPG consumption, mobile combustion sources, generator fuel and air conditioning gases used in the heating and production line.

Scope 2 Indirect Emissions: The electricity consumption used in the production and offices purchased by the company is formed.

Scope 3 Other Indirect Emissions: Business trips (airline) consist of personnel services.

In order to reduce our carbon footprint, as a company, we prefer recyclable packaging and shipping materials, products made of smaller and easily degradable materials, especially electricity produced from alternative energy sources, regardless of cost factors. In the pyrometallurgy processes, which is one of the refining processes , R&D studies continue continuously to pay attention to the use of natural gas.

- | | | |
|---|--|--|
| <ul style="list-style-type: none">• Despite the high cost in melting processes, pure oxygen is used instead of air in combustion processes to reduce waste heat transport.• All oven and stove systems have ideal heat insulation.• Air-conditioned systems in the units are provided with natural ventilation whenever possible..• In new purchases, priority is given to products and brands with low energy use.. | <ul style="list-style-type: none">• In all our production lines and lighting, equipment and installations with low energy consumption are used.• Lighting installations that do not have to be constantly on are sensory.• Priority is given to the closest sources in the supply chain.• Packaging materials are never used more than necessary. | <ul style="list-style-type: none">• Our packaging materials are degradable in nature.• It is preferred that the purchased materials / chemicals are concentrated.• Employees are encouraged to use the shuttle.• Heat regeneration systems are used.. |
|---|--|--|

National / International Compliance

For Nadir Metal Refinery, the issues within the scope of “Compliance” are an indispensable element of the sustainability of the company and its activities. Nadir Metal Refinery is aware of the risks related to the supply chain and business practices, and maintains its way of doing business in full compliance with nationally and internationally accepted standard guidelines , directives and responsible business practices, and reflects all updates to its activities and internal management system.

In order to ensure the existence and continuity of the Responsible Supply chain, precious metals must come from legal and ethical sources at any point in this chain, not to contribute to money laundering, conflicts and financing of terrorism , not to allow child labor, not to violate human rights, to prevent bribery and corruption. is aware of its responsibility to comply with occupational health and safety and environmental principles, including regulations.

Nadir Metal Refinery's sustainable and responsible supply chain approach is based on the policies, procedures and due diligence process determined as a company.



Changes and updates made within the scope of supply chain management and compliance are carried out with the participation of the relevant departments and all employees within the company, and are supported by in-house trainings, where necessary, under the responsibility of the compliance officer, in order to maintain activities in accordance with the relevant standards , policies and compliance procedures . In addition to this, training on compliance is also held annually with the external Legal Consultancy firm.

Sustainability issues are considered as an integral part of the risk review process . In this context , the identification of risks that may endanger the existence, development and continuation of the company and its supply chain , its early diagnosis , evaluation of identified risks , implementation of necessary precautions and management of risks are discussed in detail in our company policy and Risk Assessment Guide . Due diligence is also carried out on all potential and current customers/suppliers, the countries of origin of precious metals and where they operate.

In the event that the parameters under the heading “Criteria for the High-Risk Gold and Silver Supply Chain” exist or exist, they are evaluated by the compliance officer and/or the Risk Committee directly reporting to the Board of Directors , and the authority for the establishment or continuation of the business relationship is determined by the Risk Committee . Except for the decisions within the framework of obligations arising from international memberships , the final decision belongs to the Board of Directors.

A consistent business relationship based on transparency, honesty and accountability is the basis of the relationship established by Nadir Metal Refinery with all its internal and external stakeholders. Knowing the importance of being transparent , sharing , efficient and harmonious in customer and supplier relations , Nadir Metal Refinery supports all its stakeholders in fulfilling this understanding and responsibilities and increasing their awareness of compliance for the integrity , compatibility and sustainability of the supply chain. In this context, it carries out studies for the adoption of a common understanding by sharing information about the relevant legal regulations and company policies. Nadir Metal Refinery employees and other stakeholders , within the framework of the principle of confidentiality , to indicate possible concerns and risky situations , they can send their e-mail notifications to“etik@nadirmetal. com.tr“.

The company adopts a management process based on 5 steps , in order to identify the risks that may affect the responsible gold/silver processes in the supply chain , to reduce their possible effects and to ensure the continuity of compliance.

1	2	3	4	5
Establishment of strong company management systems.	Identifying and assessing risks in the supply chain.	Designing and implementing a strategy that can respond to the identified risks.	Audit of compliance work by independent third parties.	Annual reporting of supply chain compliance studies.

NATIONAL / INTERNATIONAL STANDARDS AND GUIDELINES

Nadir Metal Refinery takes into account the sanctions imposed by the United Nations Security Council resolutions, issued by the American Treasury OFAC, the European Union, the United Kingdom Treasury and other sanctions to which the precious metals market is subject, in accordance with the local legislation and regulations of the countries, national and international standard requirements, and undertakes not to be involved in any direct or indirect trade with the **countries / regions / persons / organizations** within this scope and with the countries called for action by the **FATF**. In this context, it monitors the Responsible Gold and Silver Procurement processes by applying them appropriately and accurately in order to identify and minimize the risks that have occurred or may occur.

Nadir Metal attaches great importance to the dissemination of sustainability in the supply chain. In this context, since it sees its suppliers /customers as an important part of this chain, it encourages the stakeholders in the whole chain to cooperate and work together while developing its own sustainability practices.

- Financial Crimes Investigation Board

- Borsa Istanbul Responsible Gold Supply Chain Guidance

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas and the Supplement on Gold

- LBMA Global Precious Metals Code

- LBMA Responsible Gold Guidance

- LBMA Responsible Silver Guidance

- World Gold Council Conflict Free Gold Standard

MEMBERSHIPS AND ACCREDITATIONS

Nadir Metal Refinery is regularly audited by independent auditors every year on the Responsible Gold and Silver Supply Chain, and the relevant **compliance and independent audit** reports are published on our website under the title of "Compliant Gold and Silver".



STAKEHOLDER PARTICIPATION IN THE PANDEMIC

Affecting the entire business world negatively, Covid-19 continues its pressure on all sectors. In this process, the value of alternative sources and methods has gained more importance for the continuity of the business and the continuity of a sustainable supply chain. As Nadir Metal Refinery, the most accurate and sustainable decisions were taken cautiously in the meetings and trainings held with internal and external stakeholders during this process, planned through the Zoom application.

The compliance department regularly attended the webinars given by the institutions /organizations with which it has membership and accreditation, and was informed about the latest developments and provided training on relevant updates and changes.

OCCUPATIONAL
HEALTH AND SAFETY

Rare Metal Refinery; operates in areas characterized as sectors with a very dangerous working environment . Occupational Health and Safety is at the center of our companies ' responsible production approach , which sees its employees as its most important asset and is aware of the importance of the safety of the facilities.

Adopting the approach that all accidents are preventable , Nadir Metal Refinery carries out its activities with the goal of Accident Free Refining . In Nadir Metal Refinery , reducing accident frequency and accident severity rates to zero , spreading a behavior -oriented safety culture , managing OHS risks by utilizing the latest technology and approaches, keeping work environments and processes safe with all practices implemented in the field of OHS, It is aimed to prevent diseases and protect employees.

OHS LEADERSHIP

Our managers at all levels are our OHS Leaders who are moving towards the same goal!

CONTINUOUS EDUCATION

With continuous training, we make a difference with our employees who have OHS competence at all levels.

Accident
Free
Approach

CONTINUOUS IMPROVEMENT

Based on our commitment to continuous improvement, we constantly evaluate our various programs and key performance indicators and learn continuously.

OHS CULTURE

OHS is not only our responsibility , it is our core value internalized by our employees at all levels.

The Occupational Health and Safety Board, which plans and carries out OHS activities at Nadir Metal Refinery , identifies areas for improvement in terms of OHS Systematics , Occupational Health and Safety and Process Safety , and eliminates unsafe conditions and behaviors by eliminating the deficiencies it has identified.

OCCUPATIONAL HEALTH AND SAFETY

In order to prevent the spread of the Covid-19 epidemic, which is the main subject of 2020, among employees;

Within the scope of Occupational Health and Safety, precautions were taken in all work areas, entrances /exits, cafeteria, personnel services and rest areas, and the compliance with these measures was periodically checked and the management was informed throughout the year. In addition, all collective activities have been postponed.

At Nadir Metal Refinery, risks that may be encountered during production activities are meticulously evaluated within the scope of OHS studies, necessary precautions are taken, and thus, it is aimed to prevent work accidents and occupational diseases. With OHS risk assessment studies; It is aimed to identify areas open to improvement in terms of process safety, to eliminate unsafe conditions and behaviors by eliminating deficiencies, and to ensure the continuity of OHS awareness by transforming it into a culture. At monthly OHS board meetings, current situations are evaluated and reports are presented to the senior management.

OHS PERFORMANCE AT NADİR METAL RAFİNERİ;

developed by applications such as;

- Announced-Unannounced Security Tours,
- OHS Site Tours,
- Emergency Drills,
- Fire Drills
- OHS Board Meetings,
- Legal Legislation Controls,
- Company Compliance Controls,
- Near Miss Systematics,
- Risk Assessment Studies,
- OHS Trainings

Environment measurements (dust, gas, noise, thermal comfort, lighting, etc.) are carried out in areas deemed necessary by OHSB, and it is aimed to keep the working environments in compliance with the standards.

OCCUPATIONAL HEALTH AND SAFETY

All activities within the scope of Occupational Health and Safety at Nadir Metal Refinery are carried out with a web-based OHS Software, the license of which is renewed every year.



In addition to all the controls and improvements made in order to prevent work accidents, personal protective equipment suitable for the work they do is given to all employees in return for their signature on embezzlement forms, and the use of PPE is audited. In addition, Nadir Metal Refinery employees' employment examinations, periodic examinations, radiological analyzes, all health screenings, toxicological analyzes, physiological tests, polyclinic examinations are constantly performed and recorded and controlled by the Workplace Physician.

Inspections and controls continue at Nadir Metal Refinery in order to prevent the spread of the Covid -19 epidemic and to raise awareness of all employees. Controls ; It is carried out in order to prevent the spread of the epidemic within the company and in the normal lives of the employees and to prevent the employees from catching this disease that will cause death or permanent damage. In this context , employees are warned about their unsafe behavior , informed about the importance of the issue and obey the rules . In order to raise awareness about the Covid -19 epidemic and all other dangers, relevant warning and information boards have been placed in many parts of the factory . Thus, in order to prevent the spread of the epidemic, it was ensured that the employees were informed about the rules applied in the facilities and offices and the measures taken, they displayed the right behaviors and made this a culture in their business and social lives.

Nadir Metal Refinery attaches importance to the fact that visitors , as well as its employees , are informed about occupational health and safety. In order to ensure the safety of visitors and to protect company employees from external dangers that may occur due to violations of rules by outsiders , information is provided with video screenings. Visitors are informed about what to do in an emergency and visitor records are kept.



OCCUPATIONAL HEALTH AND SAFETY TRAININGS

Considering that education is one of the most important tools for cultural transformation, training and awareness-raising activities on occupational health and safety are carried out at Nadir Metal Refinery in order to reduce risks, provide positive behavior change and raise awareness.

In 2020, OHS trainings continued to be provided on a wide variety of subjects, some of which are listed below, according to the needs of the field of activity.

- Basic Occupational Safety Trainings
- Covid-19 Awareness Trainings
- Certified First Aid Trainings and Certified First Aid Renewal Trainingsi
- Fire Prevention and Fire Protection Training
- Trainings on the Use of Protective Materials
- Trainings on Workplace-Specific Risks
- Emergency Drill
- OHS Trainings for Systematics
- Basic OHS Trainings for newly recruited personnel

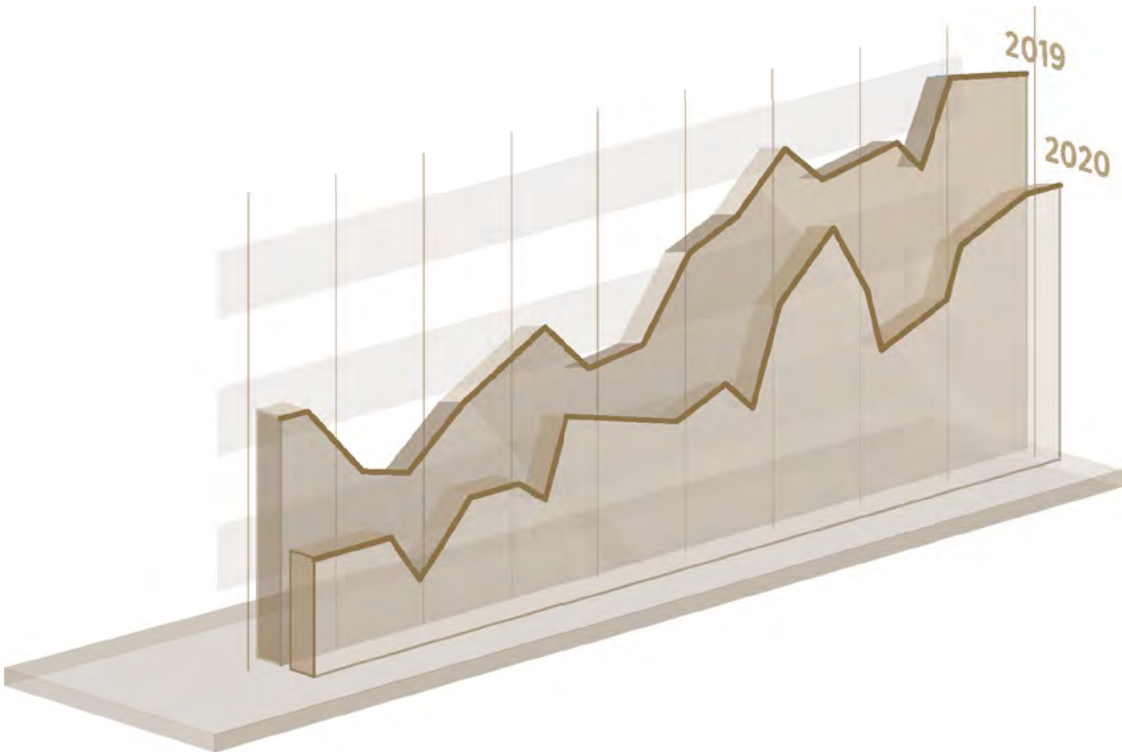


In 2020, an average of 16 hours of OHS training was provided per employee.

Despite all the controls and improvements made, there was one occupational accident with injury as a result of the personal fault of the employee in 2019, and 65 days of labor was lost as a result of the accident. All adverse conditions that caused this accident have been eliminated in a controlled manner.

	Accident Frequency Rate	ACCIDENT WEIGHT RATIO
2019	4.94	3.51
2020	4.78	2.48

With all controls and improvements made throughout 2020, nonconformities detected in terms of OHS have been improved by 96.4%.



OHSB prepares a report at the end of each year in order to evaluate the work of that year and to determine the issues to be included in the work program of the following year, according to the experience gained, and submit it to the information of the senior management.

OCCUPATIONAL HEALTH AND SAFETY TRAININGS

Recruitment examinations , Periodic examinations , Radiological analyzes , all health screenings and Toxicological analyzes, Physiological tests, Polyclinic examinations of Nadir Metal Refinery employees are carried out continuously and periodically , and they are kept under record and control by the Workplace Physician.

In 2020, 844 man*hour occupational health and safety training was given to Nadir Metal employees by an occupational safety specialist and a workplace doctor.

Factory Total Number of Employees



Table of Educational Status of Nadir Metal Employees

Education Degree	Number	%
High school	15	43
Associate Degree	5	14
Graduate	13	37
Post Graduate	2	6



SUBJECT OF TRAININGS	NUMBER OF TRANIEE	TRAINING CONTENT
Occupational diseases and prevention principles (4 hours) x 2	51 persons - 44 persons	Causes of Occupational Diseases , Principles of Disease Prevention and Application of Prevention Techniques, Biological and Psychosocial Risk Factors, First Aid
Occupational Health and Safety Training	51 persons - 44 persons	Information on Labor Legislation, Occupational Health and Safety Law No . 6331 , Legal Rights and Responsibilities of Employees , Legal Consequences Arising from Work Accident and Occupational Disease
Basic Occupational Health and Safety Training	51 persons - 44 persons	Occupational Health and Safety in Precious Metals Processing , Chemical , Physical and Ergonomic Risk Factors , Manual Lifting and Transport , Safe Use of Work Equipment -Safe Use of Machinery , Bench and Devices , Hand Tools/Dangers and Risks , Electrical - Electrical Hazards , Risks in Workplaces , Electrical Accidents and Prevention Measures , Safety and Health Signs , Use and Importance of Personal Protective Equipment
Fire training and fire extinguishing practice	Emergency Equipment and other personnel (88 people)	Precautions To Be Taken Against Flash , Explosion , Fire and Fire-Extinguishing and Rescue How Should It Be Done? Evacuation and Rescue / Emergencies at Workplaces

OCCUPATIONAL HEALTH AND SAFETY

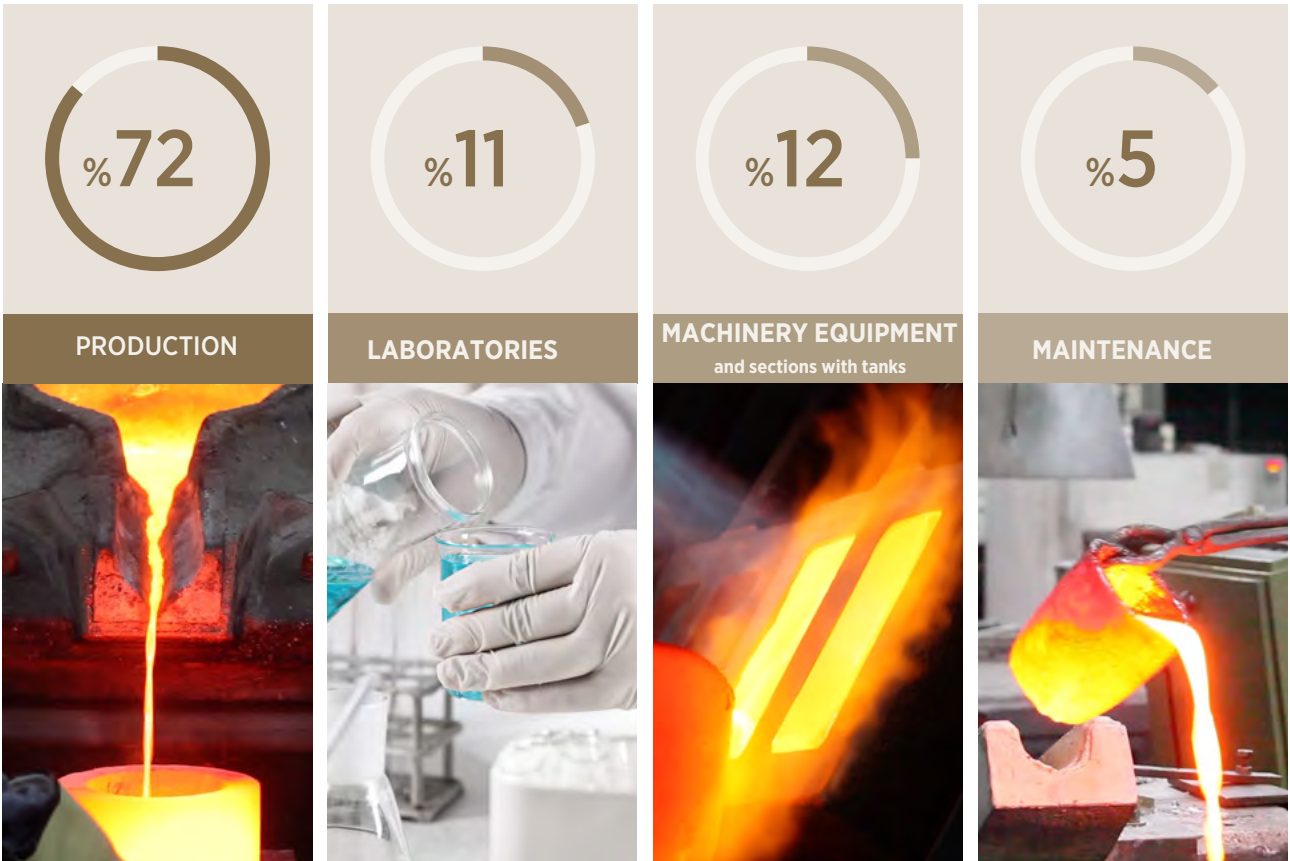
Risk Control Methods Applied in
Nadir Metal Refinery



With the Risk Assessment Report prepared for Nadir Metal and the periodic controls made in all production areas, it is aimed to prevent health hazards and risks that may arise from the environment in which the employees are located , and to protect the employees against work accidents and occupational diseases. As of 2020, no occupational disease has been detected in the employees.

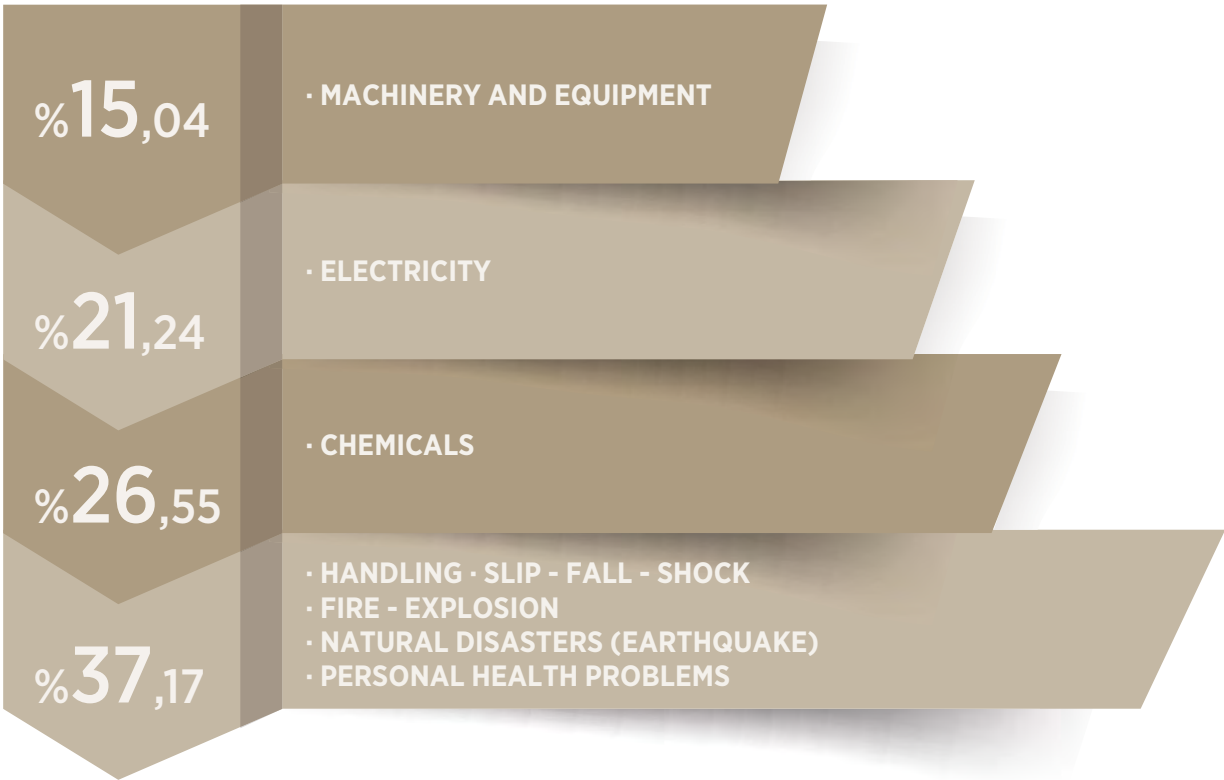
Necessary health examinations of all employees are made at specified periods and recorded.

% distribution of identified hazards and risks by departments (According to Nadir Metal Refinery's current risk assessment report)



OCCUPATIONAL HEALTH AND SAFETY

Causes that may cause an accident, depending on the risk assessment.
(According to Nadir Metal Refinery's current risk assessment report)



% risk ratios by action type
(According to Nadir Metal Refinery's current risk assessment report)



All ambient measurements (dust, gas, noise, thermal comfort, lighting, etc.) planned for 2019 were made for the required production area and working areas of the enterprise. According to the measurement reports, all the revisions and regulations in the necessary sections and the working environments have been made in accordance with the standards.

It is tried to prevent possible occupational accidents that may occur with the use of chemicals that are used extensively in the factory, especially in the production sections. In this regard, awareness of all employees is increased with warning signs posted in relevant places.



Within the scope of the "HEALTH AND SAFETY CONDITIONS REGULATION IN THE USE OF WORK EQUIPMENT" published by the MoLSS in the Official Gazette dated 25.04.2013 and numbered 28628, the maintenance and controls of all tools, equipment and equipment used within the company are carried out as specified in the OHSAS 18001 OHS Management System, all mentioned equipment is operated and used with conformity reports.

Thanks to the applied fire and building evacuation drills given to 88 personnel as planned in 2019; It is aimed to be prepared for emergencies that may occur, to review emergency measures, to ensure that the personnel learn about emergency action styles, and to improve the ability of emergency teams to respond to the event.

Despite all the controls and improvements made, there was one injury-related work accident in 2019 as a result of the personal fault of the employee. As a result of the accident, there was a loss of 89 days of labor. In order to prevent this work accident from reoccurring, training was given to the relevant personnel and negative conditions were eliminated.

The Occupational Health and Safety Board, at the end of 2019, evaluated all the work done within the scope of OHS and using the information and data obtained; In order to determine the issues to be included in the next year's work program, it prepared a report and submitted it to the senior management.

LABORATORIES

Nadir Metal Refinery has two laboratories with superior equipment and expert staff, which have certificates of quality and adjustment house.

Nadir Metal Refinery San. ve Tic. As the laboratory of A.Ş., we adopt to make our analyzes in the most accurate , most sensitive way , based on the principle of confidentiality , in a reliable and impartial manner , by making use of international quality standards and management systems in business processes, with our experienced team.

Our laboratory works with quality and impartiality in the shortest time, in the most accurate , most sensitive way, with the continuous improvements created within the framework of the "ISO / IEC 17025 Laboratory Requirements and ISO 9001 Quality Management System" standards , based on scientific foundations , good professional and technical practices . In our scope of service , we prove our competence by regularly participating in international proficiency tests every year . We aim to continuously improve our quality by constantly following national and international technical practices and regulations , by constantly improving our personnel , by carrying out the work we do with procedures and instructions in accordance with the standards, and to ensure continuity with them.



The purpose of the laboratories is to perform analyzes under the most appropriate conditions, with highly qualified personnel, within the principle of impartiality, based on the principle of confidentiality and using international methods.

Every year, the Republic of Turkey Mint and TURKAK audits are successfully completed.

Years of Participation

2009

TURKAK

ACCREDITATION

2008

AYAR EVİ

AUTHORITY

TS EN ISO 11426 Cupellation Method (Fire Test), ISO 15093 ICP-OES Difference Method (Gold impurity analysis), ISO 15096 ICP-OES Difference Method (Silver impurity analysis), TS ISO 13756 Potentiometric Method (Silver determination), TS 7696 Gravimetric The method (Silver determination) works according to its own standards.In addition, our laboratory also performs platinum group analyzes and soil analysis. In this context, analyzes of Rhodium Sulphate, chemical salts and lapping baths that we produce in our laboratories , intermediate product control of every stage of our process , analysis of gold and silver products to be presented to the national and international markets and analyzes of waste water are carried out. In this way, proper discharge and production of suitable products are guaranteed.

Nadir Metal Refinery Laboratory In line with our R&D vision, we work with a solution-oriented team that fully meets the needs of our production . Our R&D strategy is based on increasing the skills of laboratory staff, who feed and develop each other, and as a result, develop their own knowledge , experience and technology in order for Nadir Metal Refinery to achieve its goals.

Our laboratory creates , develops and adopts a constantly improving quality system with internal / external trainings. Laboratory personnel received a total of 82 hours of training, including technical and personal development , in 2020 . These trainings are constantly renewed in line with developing technologies , changing and emerging risks and are repeated in a planned manner according to the needs of our personnel.

As Nadir Metal Refinery Laboratory, we work with the principle of preventing environmental pollution, reducing waste, using energy efficiently, and ensuring responsible consumption of natural resources.

CORPORATE SOCIAL RESPONSIBILITY PROJECTS

Support to Youth and Sports

► Istanbul Basketball Sports Club



Established in 2005 in the Kemerburgaz Göktürk region, Istanbul Basket trains many successful athletes in their field, while teaching young athlete candidates the team spirit, it ensures that they grow up as individuals who have completed their personal development. In order to contribute to this mission, a sponsor agreement was signed with the Nadir Gold brand of Nadir Metal Refinery, and young athletes were supported.

İZEV

► The wall of minds that has to be demolished!

Nadir Metal Refinery, which is the main supporter of İZEV - Istanbul Foundation for Education and Solidarity for the Mentally Handicapped, which works to ensure that individuals with special needs are accepted as different individuals by the society, prepare them for independent life and take part in all areas of life, is an international project launched in 2017. and "Life and Us" 2020 exhibitions, which received national and international awards, continued to break down the walls in minds.



Elazig Earthquake

► We will heal the wounds together



The 6.8 magnitude earthquake that occurred on January 24, 2020, with the center of Sivrice district, caused great sadness. As Nadir Metal Refinery, it donated with the motto "We will heal the wounds together" in order to help the citizens affected by the earthquake in Elazig to heal their wounds. On this occasion, it made a great contribution to the purchase of many necessities for the earthquake victims.

İZEV

► Stand by me, be with me

İZEV, which operates to raise awareness for individuals with special needs, has started the preparations for the "Awareness" themed "Stand By Me, Be With Me" clip after acquiring the right to use the song "Stayin' Alive" by the world-famous music group Bee Gees. The clip, which we will sing and play by individuals with special needs, will be published on all digital platforms.





NADİR METAL RAFİNERİ

nadirmetal.com.tr