

**GRAMALTIN KIYMETLİ MADENLER  
RAFİNERİ SANAYİ VE TİCARET A.Ş.  
INDEPENDENT REASONABLE  
ASSURANCE REPORT  
(ISAE 3000 ENGAGEMENTS)  
ON THE REFINER'S COMPLIANCE  
REPORT FOR THE YEAR ENDED  
31 DECEMBER 2024**

To the Board of Directors  
Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş.

**Independent Reasonable Assurance Report to Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. (ISAE 3000 engagements)**

We were engaged by the Management of Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş., the Company, the Refinery and GramAltın) to provide a reasonable assurance on its Refiner's Compliance Report for the year ended 31 December 2024.

The assurance scope consists of the Refiner's Compliance Report (the Report).

**Responsibilities**

The management of the Company is responsible for the preparation and presentation of the Refiner's Compliance Report in accordance with the **Emirates Bullion Market Committee (EBC) Rules for Risk Based Due Diligence in the Gold Supply Chain (EBC Rules for RBDG / Version 1 / 2021)** and its **Annex 2 - EBC Review Protocol**. This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the management as relevant for demonstrating compliance with the Guidance are the activities described within the Refiner's Compliance Report.

Our responsibility is to carry out a reasonable assurance engagement in order to express an opinion as to whether the Refiner's Compliance Report, in all material respects, describes fairly the activities undertaken during the year to demonstrate compliance, and that management's overall conclusion contained therein is in accordance with the requirements of the Guidance. We conducted our engagement in accordance with the International Standard on Assurance Engagements ("ISAE") 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board and **Emirates Bullion Market Committee (EBC) Rules for Risk Based Due Diligence in the Gold Supply Chain (EBC Rules for RBDG / Version 1 / 2021)** and its **Annex 2 - EBC Review Protocol**.

Our work has been undertaken so that we report to Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. on those matters that we have agreed to state to them in this report. Our tests are related to GramAltın as a whole rather than performed to meet the needs of any particular customer.

Our report must not be recited or referred to in whole or in part in any other document nor made available, copied or recited to any other party, in any circumstances, without our express prior written permission. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the GramAltın for our work, for this report or for the opinions we have formed.

**Subject matter**

This report covers Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş.'s general level of compliance in accordance with the **Emirates Bullion Market Committee (EBC) Rules for Risk Based Due Diligence in the Gold Supply Chain (EBC Rules for RBDG / Version 1 / 2021)** for market participants in the gold and precious metals industry and its **Annex 2 - EBC Review Protocol** as described in Refiner's Compliance Report as at 15 March 2025.

### Scope based on Reasonable assurance:

The review procedures undertaken by us will cover to the following:

- i. We have observed that Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. has established a robust sustainable Supply Chain Management System. GramAltın's Gold and Precious Metals Supply Chain Policy includes a scope, distributed responsibilities and has customer acceptance policy. They have also trained their staff regularly about the supply chain policy. GramAltın has assigned a dedicated compliance officer who has deep information regarding with supply chain policies. GramAltın Compliance Officer conducts all monitoring and applications of statutes related to adaptation. At the same time, GramAltın Compliance Officer is also the Chief Compliance Trainer. A Company Compliance Committee has been formed to operate under the supervision of the Chairman of the Board. Its operational aspect indicated in the Compliance Directive of GramAltın.

Every unit and all employed personnel engaged in gold and gold containing metal business within GramAltın are responsible for meeting the requirements of corporate Gold Supply Chain Policy, informing on any problems or shortcomings within the shortest period, and carrying out appropriate corrective actions.

- ii. GramAltın is able to identify and assess the risks in the supply chain. GramAltın uses a strong management system in order to identify and assess the risks associated with gold and precious metals which they produce, distribute, transport, export and/or purchase.

Conducting a risk assessment on each party included in the supply chain from the mines (mined gold and precious metals) to the company including suppliers, exporters and transporters (mined/recycled gold and precious metals) using a risk-based approach.

Within the entire process, everything that will contribute to:

- Armed conflict,
- Widening of violence,
- Violation of human rights,
- Money laundering,
- Finance of terrorism
- Artisanal mining

are considered high-risk, high-risk client or high-risk transactions.

With this objective, GramAltın put into effect the Gold Supply Chain Policy, maintain its currency and through sharing, achieve a common collective consciousness among all company personnel, clients, business partners and other concerned third parties. All units of the Company involved in gold business have implemented a Gold Supply Chain Risk Management Plan and conduct client relationships within the principles of Client Acceptance Policy.

- iii. GramAltın has been taking the following steps to mitigate the following risks identified.

#### **Serious Violations Relating to the Extraction, Transportation and Commerce of Valuable Minerals:**

While conducting business or acquiring minerals in areas affected by conflicts or in high-risk areas, none of the issues below were tolerated or exploited for benefit by GramAltın:

- a. Inhumane behaviour or conduct such as torture, oppression
- b. Forced labour or non-voluntary work under threat
- c. Child labour use not permitted by laws
- d. Other human rights violations such as sexual violence
- e. Crimes such as ethnic cleansing, genocide or crimes against humanity, war crimes and serious violations of human rights.



**Scope based on Reasonable assurance: (Continued)**

iii. GramAltın has been taking the following steps to mitigate the following risks identified. (Continued)

**In Relation to Management of Serious Violations Concerning the Extraction, Transportation and Commerce of Precious Minerals:**

When serious violations concerning the above identified, transactions and commercial relationship was either suspended or terminated immediately.

**Direct or Indirect Support of Non-Governmental Armed Groups:**

None of the below subjects were tolerated by GramAltın concerning direct or indirect support of non-governmental armed groups or those in collusion during the extraction, transportation, trade, import or export stages of the mineral:

- a. Illegal control of ore areas or transportation routes within the supply chain
- b. Illegal taxation, money extortion or racketeering in entry to mining areas or transportation routes
- c. Illegal taxation or extortion of money from intermediary organizations, export companies or from persons engaged in international trade.

**Concerning Risk Management of Direct or Indirect Support of Non-Governmental Armed Groups:**

When suspicion involving direct or indirect support of non-governmental armed groups or those in collusion was encountered during the mineral extraction, transportation, trade, import and export stages, transactions and commercial relationship was either suspended or terminated immediately.

**Concerning Public or Private Security Forces:**

GramAltın has not had any illegal taxation and money extortion relationship concerning mining areas, transportation routes, places where mineral trade is conducted, or elements closely related with supply chain which are under illegal control of public or private security forces.

GramAltın was aware of the role of public or private security forces charged with the safety of mining areas and vicinity, transportation routes, personnel employed at such places, materials, equipment and trade conducted.

GramAltın and others in supply chain have entered into agreements only with public and private security forces that provide services in the context of safety and human rights within the framework of international principles and standards.

In payments made to public security forces, GramAltın has supported transparency and responsibility providing efforts and implementations of local authorities, international organizations and civil society organizations.

GramAltın has supported efforts and applications of local authorities, international organizations and civil society organizations in revealing potential negative effects of public or private security forces in mining areas, small scale mining operations or production facilities.

**Concerning Risk Management of Public or Private Security Forces:**

In consideration of its position within the supply chain, GramAltın has adopted the principle of implementing a risk management plan concerning management of risks related to support of client or company, public or private security forces.

**Concerning Misdeclaration of Precious Mineral Source by Way of Bribery or Deception:**

GramAltın hereby declares that it did not engage in any bribery for situations of false or incorrect information declaration, etc. or any proposals which may be construed as such, demands, claims, or promises in activities concerning payments made to the State in matters such as mineral's origin, taxation, fees and licensing.



## Scope based on Reasonable assurance: (Continued)

iii. GramAltın has been taking the following steps to mitigate the following risks identified. (Continued)

### Concerning Tax Paid to the State, License and Fees:

GramAltın warrants that all taxes, licenses and payments related to mines in areas affected by conflicts or high-risk areas are in the framework of applicable laws and implementations.

### Concerning Risk Management Relating to Wrong Declaration of Valuable Mine's Origin by Way of Bribery or Deception, Money Laundering and Taxes, License and Fees Paid to the State:

GramAltın guarantees in accordance with its position in the supply chain process that it was in contact and conducted the required relationships with central or local government authorities, international organizations, civilian authorities and affected 3rd parties for the purpose of discovery and reduction or elimination of above indicated risks. Details of risk management concerning the supply chain processes, action types and the workflow diagrams are present in the corporate Risk Management Plan.

iv. GramAltın supports all preventative measures, efforts and applications to obstruct anti-money laundering and Combating Financing of Terrorism during the entire process covering mineral extraction, transportation, trade stages, including applications at points of passage to mining areas, export and taxation.

## Inherent limitations

Non-financial information, such as that included in the Refiner's Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods used by Refiners to comply with the Guidance may differ. It is important to read the GramAltın's Gold Supply Chain Policy available on GramAltın's website [www.gramaltin.com](http://www.gramaltin.com)

## Independence and competency statement

In conducting our engagement, we have complied with the applicable requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board of Accountants.

In conducting our engagement, we confirm that we satisfy the criteria for assurance providers as set out in the Audit Guidance to carry out the assurance engagement.

## Conclusion

In our opinion, in all material respects, the accompanying Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş.'s Compliance Report prepared by the directors for the year ended 31 December 2024 describes fairly the level of general compliance of the refiner's with **Emirates Bullion Market Committee (EBC) Rules for Risk Based Due Diligence in the Gold Supply Chain (EBC Rules for RBDG / Version 1 / 2021)** and its **Annex 2 - EBC Review Protocol** as at 15 March 2025.

RSM Turkey Uluslararası Bağımsız Denetim A.Ş.  
Member, RSM International

Eray YANBOL  
Engagement Partner

Istanbul  
4 July 2025

Enclosure:

- Refiner's Compliance Report



GRAMALTIN KIYMETLİ MADENLER RAFİNERİ SAN. ve TİC. A.Ş.

## GRAMALTIN KIYMETLİ MADENLER RAFİNERİ SANAYİ VE TİCARET A.Ş. (GRAMALTIN) EBC COMPLIANCE REPORT

The Emirates Bullion Market Committee (EBC) Rules for Risk Based Due Diligence in the Gold Supply Chain – Version 1/2021 – EBC Rules for RBDG has been established for EBC Accredited member Refiners to adopt high standards of due diligence in order to combat systematic or widespread abuses of human rights, to avoid contributing to conflict, to comply with high standards of anti-money laundering and to combat terrorist financing practice.

This report summarizes how GRAMALTIN has complied with the requirements of the EBC Rules for RBDG.

**TABLE 1: DETAILS OF REPORTING ENTITY**

<b>REFINER'S NAME</b>	Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. (GRAMALTIN)
<b>LOCATION</b>	Yenibosna Merkez Mah. Ladin Sok. Kuyumcukent Apt. No:4/1235 Bahçelievler / İstanbul / Turkey
<b>REPORTING PERIOD</b>	January 1, - 31 December 2024
<b>DATE OF REPORT</b>	15 March 2025
<b>SENIOR MANAGEMENT RESPONSIBLE FOR THIS REPORT</b>	Recep YAVUZ ( <a href="mailto:recep.yavuz@gramaltin.com.tr">recep.yavuz@gramaltin.com.tr</a> )

### GRAMALTIN'S EVALUATION:

Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. (GRAMALTIN)'s primary objective is to create exceptional value for its customers, suppliers, partners and shareholders, within a culture of responsible sourcing, complying with the regulations and the needs of the relevant certifications, performance, governance, trust and respect.

“Responsible Sourcing” is a key and very important principle for GRAMALTIN. GRAMALTIN implements the whole KYC due diligence process starting from the origin of the gold to ensure that it complies with all related regulations and applicable laws both in Turkish local market and globally considering EBC Rules for RBDD and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

**GRAMALTIN KIYMETLİ MADENLER RAFİNERİ SAN. ve TİC. A.Ş.**

Yenibosna Merkez Mah. Kuyumcukent Sk. Kuyumcukent No: 4 İç Kapı No: 1235 Bahçelievler / İSTANBUL  
Tel: 444 7 266

Yenibosna Vergi Dairesi: 620 051 9996

**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE****RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS****Compliance Statement with Requirement:**

We have fully complied with Rule 1: Supply chain management systems.

**a. Develop a policy and processes for responsible supply chains, implementation of KYC system and processes****Comments and Demonstration of Compliance:**

GRAMALTIN has adopted a company-wide precious metals supply chain policy and procedures binding for all its entities regarding due diligence for the responsible supply chain of precious metals including Gold, as well as other precious metals.

During the reporting year, GRAMALTIN implemented properly its responsible precious metals supply chain policy and procedures, which are consistent with the model, set out in Annex II of the OECD Due Diligence Guidance. This sets out GRAMALTIN's responsibility for conducting risk-based due diligence, screening and monitoring of transactions and governance in place accordingly.

GRAMALTIN has adapted an on-going, proactive and reactive process and a wide range of company internal policies and procedures (The precious metals supply chain policy and the other related policies and procedures: Compliance directive, Precious metals supply chain policy, Risk management plan, Corrective action plan, Customer acceptance KYC policy, workflow forms of the supply chain management, Anti-Bribery & Anti-Corruption policy, AML & CFT policy, Whistleblowing policy and Code of Conduct & Business ethics policy) regarding due diligence for supply chain of precious metals in compliance with EBC Rules for RBDG and Annex II of the OECD Due Diligence Guidance. All of these policies and procedures are communicated to all management staff and employees related to the gold/silver/precious metals (multi metal) refining process.

GRAMALTIN's KYC forms, and account opening guidelines are available on the GRAMALTIN's website; <http://gramaltin.com.tr/belgeler>

Quarterly performed regular training sessions (basic and refreshment) have been held for all staff involved with or holding responsibilities related to the precious metals supply chain, as well as the management team. The Company precious metals supply chain policy and procedures have been communicated to all employees related to the gold/silver/precious metals (multi metal) refining process.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS (continued)****b. Assign a dedicated supply chain officer****Comments and Demonstration of Compliance:**

GRAMALTIN has implemented an organizational management structure and communication processes to define the governance, roles and responsibilities, internal audit, communication and senior management review as per the adopted policy. GRAMALTIN's internal management system collects and maintains documentation regarding the sources of mined material, recycled material, or any other feedstock, in order to ensure that they have not financed conflict, have not participated in abuse of human rights or money laundering, nor financed terrorism at any point in the supply chain.

A Compliance/Supply chain Officer has been assigned to manage and oversee the supply chain process and has a direct line of reporting to Senior Management. A compliance committee which consists of from senior manager and other related personnel have been gathered mainly in quarterly basis or whenever it is needed to evaluate high risk operations

**c. Record keeping****Comments and Demonstration of Compliance:**

GRAMALTIN has established a strong internal system of due diligence, controls and transparency over precious metals supply chain, including traceability and identification of other supply chain actors.

GRAMALTIN has a robust "lot" receipts process. Specific and relevant documents must be received and all transactional details must be entered to the relevant system before the shipments are being processed in the refinery. All transactions are registered in the IT, the enterprise resource planning ERP system and the other related internal systems. The ERP and the other related internal record keeping systems gives ability and traceability to GRAMALTIN to report and track metal batches from receipt to finished goods stage. GRAMALTIN maintains all customer, supplier or shipment related documentation and records properly and accordingly. In addition, GRAMALTIN keeps all necessary records of client on boarding files and transaction documents which are maintained for ten years, as per Turkish legislation. By using ERP, effective IT and record keeping systems, GRAMALTIN has full traceability of each individual lot to the specific supplier or customer.





GRAMALTIN KIYMETLİ MADENLER RAFİNERİ SAN. ve TİC. A.Ş.

**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)**

**RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS (continued)**

**d. Enhanced relationships with suppliers**

**Comments and Demonstration of Compliance:**

During the reporting period, GRAMALTIN has strengthened company engagement with gold and silver supplying counterparts, as well as the other suppliers of potentially conflict minerals. GRAMALTIN has communicated the precious metals supply chain policy and procedures to its precious metal suppliers/customers, either in writing or verbally, and encouraged and requested them to comply with

the policy. All new suppliers or customers have to go through GRAMALTIN's responsible sourcing due diligence KYC process. Compliance department reviews every six months' period all customer or suppliers' KYC files and updates the related documentations when necessary.

GRAMALTIN requires each supplier to accept its terms and conditions in order to start business. This is undersigned by each one of them by filling and signing the compliance agreement form. GRAMALTIN's KYC due diligence process is strictly in compliance with OECD, EBC and other relevant authorities' regulations. GRAMALTIN has also have special KYC documentations and regulations for the suppliers/customers in the local Turkish market and it has also been strictly in compliance with the Financial Crimes Investigations Board of Turkey - MASAK regulations.

In this sense, the precious metals supply chain policy documents and forms that are prepared in accordance with the OECD/EBC guidelines in the scope of the due diligence have been shared with our customers/suppliers, and GRAMALTIN has requested that all gold-supplying counterparties have committed to and acknowledged in writing compliance with GRAMALTIN's Company Policy.

Site visits have been planned and implemented to suppliers/customers during the reporting year to inspect, educate them and as well as enhance our own knowledge of responsible sourcing.

**GRAMALTIN KIYMETLİ MADENLER RAFİNERİ SAN. ve TİC. A.Ş.**

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**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS (continued)****e. Security requirements****Comments and Demonstration of Compliance:**

GRAMALTIN has a Lot and traceability system database and its own designed ERP and the other internal record keeping systems that records each lot refined. The Compliance/Supply chain officer has been appointed to manage the supply chain process and supervises the whole precious metals supply chain cycle starting from origin of the gold/silver/precious metals and the due diligence process in the refinery and reports directly to senior management.

GRAMALTIN's internal control processes provide robust administrative controls for due diligence procedures carried out across all precious metal suppliers independent of their origin. These procedures have been further strengthened since the implementation of the EBC Rules for RBDD and information resulting from due diligence procedures is centralized and documented in a single source for each counterparty and managed by a dedicated individual. As mentioned earlier, an appropriate internal communication system has also developed and a system of notification of non-compliance has established that enables direct reporting to senior management/executive committee.

**f. Conduct necessary trainings****Comments and Demonstration of Compliance:**

Regular training sessions are held for all staff involved with or holding responsibilities related to the supply chain, as well as the management team. The Company precious metals supply chain policy and procedures are communicated to all employees related to the gold/silver/precious metals-refining process. The basic and refreshment trainings were held for all staff and departments of GRAMALTIN on quarterly basis. GRAMALTIN training program includes 5 category trainings on the general overview of the Company precious metals supply chain policy and procedures, Anti-Bribery & Anti-Corruption policy, AML & CFT policy, Whistleblowing policy, Code of Conduct & Business Ethics policy and the Financial Crimes Investigations Board of Turkey-MASAK & suspicious transactions reporting policies. All the training records for the reporting year were documented and filed well.

GRAMALTIN's Compliance training policy states that employees are to receive ongoing basic and refreshing trainings with respect to the responsible supply chain which has been implemented accordingly on every three months' time. The basic and refreshing trainings have been strengthened in the roles of those with compliance responsibilities and communication between staff and management. Regular training sessions have been held for all staff involved with or holding responsibilities related to the precious metals supply chain, as well as the management team. All of the precious metals supply chain-related policies and procedures have been communicated to all employees related to the precious metals refining process.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS (continued)****f. Conduct necessary trainings (continued)****Comments and Demonstration of Compliance: (continued)**

Moreover, GRAMALTIN's Corrective action plan is one of its internal compliance process inspection tools. Compliance/ Supply Chain Officer implements this policy when it is needed during the internal audit process after the planned training sessions has been performed in the related branches. The purpose of the corrective action plan is to identify activities in order to correct all non-compliance issues identified throughout all gold/silver/precious metals supply chain processes and related branches and personnel in the company.

**g. Establish a grievance mechanism****Comments and Demonstration of Compliance:**

GRAMALTIN has established a company-wide communication mechanism to promote broad-based employee participation and risk identification to management.

GRAMALTIN encourages open and honest communication at all levels. GRAMALTIN has developed a mechanism allowing any precious metals supply chain actor/employees or stakeholder to voice concerns over the gold/silver/precious metals supply chain or a newly identified risk. A functional physical mailbox – compliance access point and an e-mail (compliance@gramaltim.com.tr) has established which are reviewed by the Compliance/Supply chain Officer. Physical compliance access point mailboxes has been located in different locations of the company which can be accessed by the workers and all staff easily anytime they want to use this mechanism to report any suspicious activities.

GRAMALTIN has also established a Whistleblowing policy aims to create a work environment where employees, vendors, service providers, customers and other stakeholders are able to raise concerns on misconduct, irregularities or malpractices, without fear of harassment and/or victimization and with an assurance that their concerns will be taken seriously and investigated, and the outcome duly communicated. Employees are internal whistle blowers who report incidents of misconduct in an organization involving a peer/colleague, a supervisor or indeed a senior management official. External whistle blowers who are mostly customers/suppliers report wrong doings of employees to the Compliance, Internal audit and Human Resources. This whistleblowing policy allows GRAMALTIN to be alerted of risks in its precious metals supply chain as to the problems in addition to the company fact and risk assessments. The personal data of Whistle-blowers and of any other parties involved that is obtained while handling the Reports (including any sensitive data, such as racial and ethnic background, religious and philosophical beliefs, political opinions and personal data indicative of a person's health and sexual orientation) are being processed in full compliance with the provisions of current legislation regarding the protection of personal data, and in any case in line with the provisions of the GRAMALTIN

Group Personal Data Protection Policy. Only the data necessary for verifying the validity of the Report and for handling is being processed.

**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE 1: SUPPLY CHAIN MANAGEMENT SYSTEMS (continued)****g. Establish a grievance mechanism (continued)****Comments and Demonstration of Compliance: (continued)**

Circumstances that maybe subject to grievances, including but not limited to, are financial malpractice or impropriety or fraud, failure to comply with a legal obligation or applicable laws, human rights abuses (including dangers to health & safety and child labour), severe damage to the environment, criminal activities, improper conduct or unethical behaviours, attempts to conceal any violations of the GRAMALTIN precious metals supply chain and AML/CFT policies (early warning risk awareness mechanism), falsification of documents or fraudulent suppliers and direct or indirect link to conflict-affected or high-risk area gold financing.

**RULE2: SUPPLY CHAIN RISK IDENTIFICATION AND ASSESSMENT****Compliance Statement with Requirement:**

We have fully complied with Rule 2: Supply chain risk identification and assessment.

**a. Develop processes in place to identify the risks in the supply chain****Comments and Demonstration of Compliance:**

GRAMALTIN has developed a strong risk assessment procedure called Risk management plan which aims to identify and assess all risks in the precious metals supply chain. These procedures are supervised by the compliance department, legal advisors and other relevant personal.

GRAMALTIN identifies and assess risks in the precious metals supply chain. GRAMALTIN has established clearly defined criteria for low, medium and high-risk categories and systematically apply them to all precious metals supplying counterparties. GRAMALTIN has a client database, records and allocated a risk profile to its risk profile criteria.

GRAMALTIN does not do any business with sanctioned/embargoed countries or individuals or with Red Flags counterparties.

GRAMALTIN is using search tool (World-Check) as a source of information for individuals, companies, countries to help identification of persons, corporate entities or companies such as sanctioned, politically exposed or maybe involved in activities that go against its moral, ethical principles and its Precious metals supply chain policy and Risk Assessment Plan requirements. GRAMALTIN is also uses open-source tools which are based on risk assessment of UN, UK, EU, US sanctions and any other relevant list that is applicable to GRAMALTIN including but not limited to money laundering, terrorism financing, drug trafficking.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE2: SUPPLY CHAIN RISK IDENTIFICATION AND ASSESSMENT (continued)****a. Develop processes in place to identify the risks in the supply chain (continued)****Comments and Demonstration of Compliance: (continued)**

GRAMALTIN established a mechanism to report identified risks to the senior management. The precious metals supply chain due diligence team as well as the foreign trade, treasury, finance and accountancy departments are working in an open office environment and in very close contact with the compliance officer. This makes it possible to follow the situation at the minute. All employees are instructed to report irregularities and unusual circumstances that are not consistent with normal situations.

GRAMALTIN established a client/supplier database and allocated a risk profile according to its risk profile criteria written in the Risk management plan. Supplier/Customer risk evaluation is a formal requirement, an obligatory step before engagement with gold/silver/precious metals supplying counterparties.

GRAMALTIN has a legal advisor as well as a compliance/supply chain officer who reports to senior management on all matter regarding the risks of the precious metals supply chain. The Compliance/Supply chain officer is also responsible for the continuous training of employees for identifying risks on the precious metals supply chain with respect to the responsible sourcing. Reporting to Senior Management occurs at least once per month.

GRAMALTIN identifies and assess risks in the precious metals supply chain. GRAMALTIN has established clearly defined criteria's for low, medium and high-risk categories and systematically apply them to all precious metals supplying counterparties.

Before entering into a business relationship with any precious metals supplying counterparty GRAMALTIN systematically performs its responsible precious metals supply chain due diligence in line with all measures required by the EBC Rules for RBDG and the OECD Due Diligence Guidance for Responsible Supply Chains.

GRAMALTIN identifies the Gold-Supplying counterparty and verifying its identity using reliable, independent source documents, data or information and controls the beneficial owner(s) of the Gold-Supplying counterparty. Checking that the gold supplying counterparties and their beneficial owners are not named on UN, UK, EU, US sanctions and any other relevant list and checking politically exposed person (PEP) details of the beneficial owners. GRAMALTIN performs enhanced due diligence for all high-risk categories which is listed in its supply chain assessment form, which includes but not limited to those where gold/silver/precious metals originate from or transit via a conflict-affected, human rights abuse high-risk areas or artisanal mining areas.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE2: SUPPLY CHAIN RISK IDENTIFICATION AND ASSESSMENT (continued)****a. Develop processes in place to identify the risks in the supply chain (continued)****Comments and Demonstration of Compliance: (continued)**

In this sense, The Risk management plan and Customer acceptance policy have been implemented to identify the risks in the gold/silver/precious metals supply chain process, take action, and apply corrective actions to that effect while carrying out measures that will prevent the repetition of similar risky cases. For every supplier/customer, GRAMALTIN have established a client database and allocated a risk profile according to its risk profile criteria written in the Risk management plan. Supplier/Customer risk evaluation is a formal requirement, an obligatory step before engagement with precious metals supplying counterparties. For mined and recycled materials, different KYC questionnaires' and self-assessment forms (LSM and ASM) has been implemented and evaluated accordingly considering EBC Rules for RBDD.

Enhanced due diligence includes the completion of a site visit when necessary. GRAMALTIN employs a risk-based transaction monitoring approach towards its gold/silver/precious metals supplying counterparties. GRAMALTIN employs both qualitative and quantitative assessments both mined and recycled gold/silver/precious metals supplying counterparties.

In addition, GRAMALTIN conducts appropriate scrutiny and monitoring of transactions undertaken through the course of the relationship. Beginning from the supplier/customer and goods acceptance stage of gold from mines, supply chain due diligence and precautions are put into practice in accordance with the EBC Rules for RBDD and procedures. Procedures are put into practice that will help with the control and audit of the system, including transportation routes and monitoring of all procedures related to the precious metals supply chain.

**b. In-depth review and conduct enhanced due diligence on red-flagged suppliers****Comments and Demonstration of Compliance:**

GRAMALTIN Compliance Committee is created to periodically review and maintain the responsible precious metals supply chain compliance process. The committee gathers every 3 months to assess the processes, risks, and the resulting decisions.

All risk assessments are controlled by the Compliance officer and Compliance Committee, and high-risk customers/suppliers are reported to the senior management. Senior Management is responsible for approving all new precious metals supplying counterparties regardless of their risk category. Periodic reports are presented by the Compliance/Supply chain Officer to the CEO and senior management. Senior Management retains the ultimate control and responsibility for GRAMALTIN's precious metals supply chain.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE2: SUPPLY CHAIN RISK IDENTIFICATION AND ASSESSMENT (continued)****b. In-depth review and conduct enhanced due diligence on red-flagged suppliers (continued)****Comments and Demonstration of Compliance: (continued)**

The Compliance/Supply chain officer prepares monthly reports for the senior management and keeps all relevant records and charts regarding the customer KYC process. The Compliance/Supply chain officer also provides a commentary report to the senior management. Senior management retains the ultimate control and responsibility for the precious metals supply chain, and senior management must also approve all new suppliers classified as high risk.

GRAMALTIN considers seriously any Red Flags which is identified in any part of the entire precious metals supply chain. Red flags could be location-based, supplier-based or circumstances-based. Red Flags are reviewed in an in-depth and detailed manner including desk research, on-site visits and random sample verifications of the transactional records.

Where a Red Flag has been identified, GRAMALTIN considers the following as an indicative measure of an approach to activities with the relevant supplier/customer; with the low risk level - start or continue trading activities, with medium risk level - start or continue trading activities whilst mitigating the

identified risks, with high risk level - suspend trading activities whilst mitigating the identified risks by obtaining additional information/data confirming or refuting the adverse risk assessments or disengage from the source of the risk. Good faith efforts to make meaningful improvements on the precious metals supply chain by the suppliers/customers are very important to consider deciding the continuity of the relations with them.

**RULE 3: RISK CONTROL PLAN****Compliance Statement with Requirement:**

We have fully complied with Rule 3: Risk control plan.

**a. Develop a policy and processes for conducting risk mitigation****Comments and Demonstration of Compliance:**

GRAMALTIN has devised a strategy for risk management of an identified risk by either mitigation of the risk while continuing to trade, mitigation of the risk while suspending trade or disengagement from the risk.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)****RULE 3: RISK CONTROL PLAN (continued)****a. Develop a policy and processes for conducting risk mitigation (continued)****Comments and Demonstration of Compliance: (continued)**

GRAMALTIN uses a country profiling risk rating as a guidance. A Risk Management Plan/Strategy for GRAMALTIN has prepared and put into practice, in which risky situations and the appropriate procedures to follow during such cases of risk, as well as the risk management principles were identified. The strategy includes establishing the level of the risk, considering the country of origin, supplier, product, complexity of the supply chain, business model, sanction lists and any other relevant circumstances. The level of risk is regularly reviewed and updated. Moreover, response methods have introduced such as abolishing business relations in risky situations, the suspension of trade that would result in the alleviation of risks or achieving the alleviation of risk through other means while continuing with the trading activities.

The strategy instructs that necessary steps and investigations be carried out under the supervision of the Compliance officer while the product identified the risk factor is put into quarantine.

GRAMALTIN uses due diligence assessment forms, checklists, questionnaires and on-site visit forms for its suppliers/customers from mined or recycled sources. The Compliance/ Supply Chain Officer have been appointed to manage the supply chain process. The Compliance/ Supply Chain Officer supervises the whole precious metals supply chain cycle starting from origin of the gold/silver/precious metal and the due diligence process in the refinery and reports directly to senior management.

GRAMALTIN's management strategy of risk mitigation includes measurable steps to be taken and achieved, monitoring of performance, periodic reassessment of risk and regular reporting to designated senior management.

Based on the framework of risk analysis and the principles of the Risk Management Plan and Supplier/Customer Acceptance Policy, measures were taken by GRAMALTIN to allow the monitoring of all transactions within the process, including transportation roads and means. The relevant supplier/customer documents are registered and examined in the scope of the Supplier/Customer Acceptance Policy, and periodic reports are relayed to senior management. As explained above, GRAMALTIN has devised and adopted an appropriate strategy for risk management any identified new issue based on a 'prevent, detect and respond model', as required by EBC Rules for RBDG and the OECD Due Diligence Guidance. Risk assessments are completed in detail considering risk assessment matrix mentioned in the risk assessment plan and additional administrative measures, and further precautions are taken when accepting goods and to ensure safe business relations with all suppliers/customers.



**TABLE 2: SUMMARY OF ACTIVITIES UNDERTAKEN TO DEMONSTRATE COMPLIANCE (continued)**
**RULE 4: INDEPENDENT THIRD-PARTY AUDITS**
**Compliance Statement with requirement:**

We have fully complied with Rule 4: Independent third-party audits.

**Comments and Demonstration of Compliance:**

An Agreement was signed with independent audit firm RSM Turkey Uluslararası Bağımsız Denetim A.Ş. for the reporting period 1 January 2024 - 31 January 2024 for Independent Assurance report and Comprehensive Management Report.

**RULE 5: ANNUAL REPORTING ON RESPONSIBLE SUPPLY CHAIN DUE DILIGENCE**
**Compliance Statement with Requirement:**

We have fully complied with Rule 5: Annual reporting on responsible supply chain due diligence.

Further information and specific details of how GRAMALTIN's systems, procedures, processes and controls have been implemented to align to the specific requirements in the EBC Rules for RBDD have been set out in our Gold Supply Chain policy, which is available on our company website.

**TABLE 3: MANAGEMENT CONCLUSION**

RULES	GRAMALTIN'S SELF RATING
<b>Rule 1 – Supply Chain Management Systems</b>	✓ Fully compliant
	Compliant with Low-Risk Deviations
	Non-compliant with Medium-Risk Deviations
	Non-compliant with High-Risk Deviations
<b>Rule 2 – Supply Chain Risk Identification and Assessment</b>	✓ Fully compliant
	Compliant with Low-Risk Deviations
	Non-compliant with Medium-Risk Deviations
	Non-compliant with High-Risk Deviations
<b>Rule 3 – Risk Control Plan</b>	✓ Fully compliant
	Compliant with Low-Risk Deviations
	Non-compliant with Medium-Risk Deviations
	Non-compliant with High-Risk Deviations
<b>Rule 4 – Independent Third-Party Audits</b>	✓ Fully compliant
	Compliant with Low-Risk Deviations
	Non-compliant with Medium-Risk Deviations
	Non-compliant with High-Risk Deviations
<b>Rule 5 – Annual Reporting on Responsible Supply Chain Due Diligence</b>	✓ Fully compliant
	Compliant with Low-Risk Deviations
	Non-compliant with Medium-Risk Deviations
	Non-compliant with High-Risk Deviations

**TABLE 3: MANAGEMENT CONCLUSION (continued)**

**GRAMALTIN'S OVERALL CONCLUSION**

**Is the Refiner in compliance with the requirements of the EBC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain for the reporting period?**

Yes.

GRAMALTIN has demonstrated its commitment to continuous improvement and implemented effective and robust management systems, procedures and practices to confirm the requirements of EBC Rules for RBDD, as explained above in Table 2, for the reporting year ended 31 December 2024.

As mentioned earlier in this report, "Responsible sourcing" is a key and very important principle for GRAMALTIN. GRAMALTIN implements its risk-based KYC due diligence process starting from the origin of the gold to ensure that it complies with all related regulations and applicable laws both in Turkish local market and globally considering EBC Rules for RBDD and OECD Due Diligence Guidance for Responsible Supply Chains. GRAMALTIN is always aware of its exceptional responsibility and also acting as a leading refinery in Turkish Gold market and in the region in terms of responsible sourcing of precious metals.

**TABLE 4: OTHER REPORT COMMENTS**

If users of this report wish to provide any feedback to Gramaltın Kıymetli Madenler Rafineri Sanayi ve Ticaret A.Ş. with this respect to this report, they can contact Compliance department on [compliance@gramaltin.com.tr](mailto:compliance@gramaltin.com.tr)

15 March 2025

Recep YAVUZ

General Manager

