

NMGLOBAL KIYMETLİ MADENLER TİCARETİ A.Ş.

COMPANY POLICY ON PREVENTION OF LAUNDERING OF CRIME PROCEEDS AND FINANCING OF TERRORISM

NMGlobal Kıymetli Madenler Ticareti A.Ş. (NMGlobal) carries out its activities in compliance with the Regulation on the Measures for Prevention of Laundering of Crime Proceeds and Financing of Terrorism, which was promulgated by the Republic of Turkey in the Official Gazette no. 26751 of 09.01.2009 and the regulations and practices of the Financial Crimes Investigation Authority (MASAK), the financial intelligence organization of the Republic of Turkey.

Besides, NMGlobal adopts a policy based on the prevention of laundering of crime revenues and the fight against financing of terrorism and operates its business within the framework of the principles set out in the Borsa Istanbul Responsible Gold Supply Chain Guide for the purposes of fulfilling the conditions required by its accreditation.

NMGlobal carries on its activities by taking in consideration to regulations on that no transaction be executed with persons or organizations that are noticed and listed within the scope of the United Nations Security Council's binding decisions for member states.

Within this framework, as NMGlobal, this company policy is established for the purposes of tracking of national and international regulations and practices and of Prevention of Laundering of Crime Proceeds and Financing of Terrorism, and an active combat is launched in accordance with this policy.

Accordingly, NMGlobal's Company Policy on Prevention of Laundering of Crime Proceeds and Financing of Terrorism is established as follows.

NMGlobal develops and implements the program for prevention of laundering of crime proceeds in a manner to ensure compliance with statutory regulations concerning prevention of laundering of crime proceeds, financing of terrorism and other linked criminal activities both in Turkey and other countries where it carries out activities.

The Policies and Procedures are as follows in summary:

1) Know Your Customer Principle: Principles of the Know Your Customer procedure are to have accurate and adequate information about customers, suppliers to monitor the transactions, to track whether their activities are consistent with their income, assets and occupational information, etc.

In the foundation of the customer acceptance policy of NMGlobal concerning prevention of laundering of crime proceeds and financing of terrorism lies the "Know Your Customer" principle. Great importance is given to the "Know Your Customer" principle in order to be protected from such persons and acts who and which are related with money laundering and financing of terrorism. Within this scope, a policy complying with the relevant international standards and legislation in effect is adopted and implemented.

2) Establishment of Business Relationship: Business relationship with customers and/or suppliers is not established before the necessary information and documents have been obtained. Business relationship is not established with unanimous persons. In the acceptance of customers, along with general internet search, necessary controls shall be performed over the sanctions/exclusions lists of the United Nations Security Council(UNSC), US Treasury(OFAC), Capital Markets Board(SPK) and Electronic Public Procurement Platform(EKAP) by the Compliance Officer.

3) Maintenance: Customer data and documents and records of transactions are maintained for minimum 8 years.

4) Reporting of Suspicious Transaction: All suspicious transactions are reported to concerned authorities and, if required by the competent authority, to foreign authorities for establishment of cooperation. It is ensured that company employees act diligently in the reporting of suspicious transactions.

5) National and International Cooperation: NMGlobal works in collaboration with regulatory authorities when necessary. Collaboration includes such transactions as provision of information, blocking of accounts, etc.

6) Training: NMGlobal gives training on technical information and practice through specialists of the issue to all employees and management levels of the company on a regular basis each year.

7) Organization: NMGlobal hereby commits to comply with regulations that are binding or taken as references by establishing an audit and examination oriented organization within the company while carrying out its activities and to engage in commercial relations with individuals or organizations that do not participate in laundering crime revenues in any way and are not involved in any transaction that supports the financing of terrorism in order to comply with the decisions and practices of the relevant official institutions and the Borsa Istanbul A.S.

NMGlobal developed a strong confidential grievance mechanism that allows any of our employees or external stakeholders to anonymously voice their concerns over the gold and silver supply chain or any newly identified risks. Thereupon in case of any suspicion or observation regarding breach of this Policy, employee or external stakeholder of the NMGlobal Kıymetli Madenler Ticaret A.S. shall notify this issue via e-mail to etik@nmglobal.com.tr.

8) Compliance Officer: A Compliance Officer performs duty for the purpose of carrying out of the activities at NMGlobal in compliance with the legislation and sectorial rules and principles. The Compliance Offices works on the matters of doing the necessary works for the purpose of ensuring compliance with regulations; ensuring communication and coordination; ensuring implementation of the Compliance Program; managing the activities of monitoring and controlling and tracking the results of the training activities; submitting such works regarding the training programs toward prevention of laundering of crime proceeds and financing of terrorism to the approval of the Board of Directors and ensuring implementation of the approved training programs efficiently; making investigation and evaluation about any transactions reported to him or discovered by him ex officio, which may be suspicious, and reporting of any transactions which he decided to be suspicious to the Top Management. When fulfilling these duties, the compliance officer works in cooperation with Department of Finance, Operation and Legal Counsels, and meets with the concerned persons to this end at certain periods, making evaluations about the works.

9) Risk Management: The risk management activities concerning the implementation of the compliance program of NMGlobal are designed by the Compliance Officer in accordance with the provisions of the relevant legislation and Policy. The Compliance Officer takes in consideration to risk identification, rating, classification and assessment methods, which are based on customer risk and country risk while executing activities involving the risk management comprise. The Compliance Officer takes in consideration to national legislation and such recommendations, principles, standards and guides introduced by international organizations concerning the issues falling into the scope of risk while performing risk assessment. The Compliance Officer may take additional measures by obtaining approval of the Top Management in order to mitigate the risk to be undertaken in connection with such groups identified as “High Risk” as a result of the risk rating.

The following countries and regions and customers, suppliers domiciled in or related with these countries and regions are closely monitored within the high-risk category in terms of country risk:

- Country included in the list of “Non-cooperating Countries” as released by the FATF,
- Countries included in the list of “Risky Countries” as released by the concerned Ministry,
- Countries, organizations and individuals on which sanctions are imposed at international level pursuant to the resolutions of the Security Council of the United Nations,
- Countries announced by the European Union or the OFAC, which are said to pose high risk regarding laundering of crime proceeds,
- Cross-border centers, free zones and financial centers,
- Tax Heavens,
- Countries, which inadequate regulations concerning prevention of laundering of crime proceeds and financing of terrorism.