

NMGLOBAL KIYMETLİ MADENLER TİCARET A.Ş.

**COMPANY POLICY REGARDING DUE DILIGENCE FOR SUPPLY CHAINS OF GOLD
AND SILVER BY EXECUTING COMPANY ACTIVITIES**

As NMGlobal Kıymetli Madenler Ticaret A.Ş., (“NMGlobal” or “Company”) we carry on our activities as authorized precious metals broker under the regulation numbered 26528 and dated 21.05.2007 published on the Official Gazette “Regulation on Establishment of the Precious Metals Brokers and Principles of Activities of the Precious Metals Brokers”.

Besides, we are subjected to rules that authorized precious metals broker has also liability under the regulation numbered 26751 and dated 09.01.2018 published on the Official Gazette “Instructions on Measures Regarding the Prevention on Laundering of Crime Revenues and Terrorism Financing”.

Furthermore, we hereby commit to carry on our activities within the framework of the principles stated on Borsa Istanbul Responsible Gold Supply Chain Guidance and decisions given by the Borsa Istanbul A.Ş. and relevant public authorities.

Along with executing our activities based on the national law, we pursue a company policy that is prepared as compliant within the framework of LBMA Responsible Gold and Silver Guidances and referencing the working principles stated in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and the Supplement on Gold and international regulations.

We hereby commit to act according to our legal liabilities arising from national and international referencing regulations in the future.

SCOPE

This Company Policy (the “**Policy**”) regarding due diligence for supply chains of gold and silver is prepared for each steps of our precious metals trading activities.

This Policy is composed of the following sections:

- i.** Organization,
- ii.** Criteria for High-Risk Gold and Silver Supply Chain.
- iii.** Principles of Know Your Customer and Due Diligence for Supply Chain
- iv.** Maintaining Records;
- v.** Training;
- vi.** Conclusion.

I. ORGANIZATION

NMGlobal hereby commits to comply with Responsible Gold Supply Chain Guidance of the Borsa Istanbul, by establishing organizations focused on audit and examination in the Company and by referencing the LBMA Responsible Gold and Silver Guidance and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas and the Supplement on Gold at each steps of precious metals trading by the purpose of having business with a natural and/or legal persons that is not involved any kinds of transactions, that is laundering of proceeds

of crime and contributing terrorism financing, and of being compliant with the decisions and implementations of the Borsa Istanbul A.S. and relevant public authorities,

In this respect NMGlobal:

- assign authority and responsibility to Senior Management with the necessary competence;
- assign a “Compliance Officer” in order to support to execute and oversee the supply chain due diligence process;
- put in place an organizational structure and communication processes that will ensure critical information, including the Company policy, reaches relevant employees and gold and silver-supplying counterparties via control of the “Compliance Officer”; and
- ensure internal accountability with respect to the implementation of the supply chain due diligence.
- Our Company 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.

II. CRITERIA FOR HIGH-RISK GOLD AND SILVER SUPPLY CHAIN

The below criteria is applied in order to determine the existence of a high-risk supply chain:

The Mined or Recycled Gold and Silver originates from, has transited or has been transported via a conflict-affected or human rights abuse high-risk area;

The Mined Gold and Silver is claimed to be originated from a country that has limited known reserves, likely resources or expected production levels of gold and silver;

The Recycled Gold and Silver comes from a country where gold and silver from conflict-affected and human rights abuse high-risk areas are known, or reasonably suspected, to transit;

The Mined Gold and Silver originates from the regions of “World Heritage Site” declared by the UNESCO;

The Mined Gold and Silver is originated from artisanal and small-scale mining activities;

The Mined or Recycled Gold and Silver is produced with the use of mercury;

Gold and Silver-supplying counterparty or other known upstream companies are located in a country representing high-risk for money laundering, crime or corruption or their beneficial owners are on sanctions lists of institutions such as the United Nations, US Treasury, Capital Markets Board (SPK) and Electronic Public Procurement Platform (EKAP) in Turkey;

Gold and Silver-supplying counterparty or other known upstream companies or their beneficial owners are politically exposed persons;

Gold and Silver-supplying counterparty or other known upstream companies are active in a higher-risk business activity such as arms, gaming and casino industry, antiques and art, diamond merchants, sects and their leaders.

III. PRINCIPLES OF KNOW YOUR CUSTOMER AND DUE DILIGENCE FOR SUPPLY CHAIN

Our company acts in accordance with the “Know Your Customer Program” that it has created in all steps from the beginning of the commercial relationship to the termination of the customer.

We establish a strong internal system of due diligence, controls and transparency over gold and silver supply chains, including traceability and identification of other supply chain actors. In this respect each time we enter into a commercial relationship with a supplier and/or customer we request all the necessary information and documentation according to categories from our customers including but not limited to the ones required by the relevant legislation and Know Your Customer Form. The foregoing is also requested from people authorized to act in the name and on behalf of the customer in transactions with NMGlobal.

Our due diligence also includes “**Know Your Customer Process**” and identifying, assessing and monitoring risks in its gold supply chain beginning with the origin of the gold. NMGlobal has a process to apply due diligence following a risk based approach, screening, monitoring transactions,

Moreover, a declaration where corporate customers state that their gold or silver, funds, and precious metals deposited at Banks or kept in their ownership are not obtained illegally and that they do not directly and/or indirectly fall within the scope of the implementation resolutions of the United Nations Security Council; and that the customers have not breached and do not breach the said resolutions and any provisions of the relevant legislation on money laundering is also obtained from customers.

All information and documents obtained both existing gold/silver supplier and new customers are controlled by the Compliance Officer of our company. Additional compliance measures are implemented for all our potential customers/suppliers if necessary.

IV. MAINTAINING RECORDS

We maintain adequate records of the supply chain and purchase/sale documentation for at least 8 years, in order to demonstrate that appropriate and ongoing due diligence has been followed.

V. TRAINING

The Compliance Officer is responsible for the training programs. In this scope, regular and periodic trainings are given by legal counsels and Compliance Officer of our Company on all issues covered by this Policy including but not limited to obligations within the context of the legislation on revenues obtained from crimes, suspicious transaction types, sample events, documentation of transactions and Know Your Customer implementations.

VI. CONCLUSION

It is our principle and obligation to obtain necessary documents and information from our prospective customers before we enter into any commercial relationship with them. We avoid starting business with customers which is not well-known and does not have market reference, in case such customers do not assure us trust.

The employees of NMGlobal are obliged to act in conformity with and the policies of our company, the rules valid in the workplace and this Policy.

We closely follow all the progress pertaining to issues stated herein and we shall apply all updates in national and international legislation and implementation to our operation.