ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş.

SUPPLY CHAIN POLICY

ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş. a precious metals service provider, is fully committed in providing high quality products and services while meeting the highest ethical and moral standards with respect to responsible sourcing. We are fully committed to follow appropriate standards apply for human rights, labor standards, environmental impact, and business ethics to attain a responsible supply chain.

ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş. understand that Gold and Platinum Group Metals (Platinum, Palladium and Rhodium) recognizing that risk of significant adverse impact which may be associated with extraction, trading, handling, and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with supplier the following policy on responsible sourcing of minerals from conflict affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practice and supplier's risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nation sanction resolutions or, where applicable, domestic laws implementing such resolutions.

We strongly recommend our suppliers and counterparties to operate in accordance with the OECD, RJC CoC Standard for Precious Metals Supply Chain, the LBMA Responsible Gold Guidance and DMCC Rules for Risk Based Due Diligence in the Gold and Precious Metals Supply Chain.

As a part of our responsibility, **ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş.** is committed to:

1. Neither gain nor be a part of, assist and facilitate any transactions arising from serious abuses such as inhuman and degrading practices, force and child labor, any forms of human rights violations and all forms of criminal activities.

- Immediately discontinue dealing with our suppliers where we identify a reasonable risk that their source is from, or linked to, any party committing serious abuses as defined above.

2. Not tolerate any of its suppliers which directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals which includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates.

3. Not to offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of precious metals to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export.

4. Play a part and contribute in elimination of money laundering and terrorist financing by creating a robust management system to act in accordance with the standard of Anti - Money Laundering and Combating Financing Terrorism.

5.To inform and report to the relevant authorities any suspicious individual, entities and transactions arising upon implementing the provision of this policy.

6. Ensure that effective Due Diligence on a risk-based approach is carried before starting any transactions and continuous monitoring to existing clients to assess the level of risk and plan to mitigate the risk identified.

7. Create and keep proper and adequate records of all precious metals transaction and activities that demonstrates the due diligence has been strictly followed.

8. Train relevant staff and educate its employees through formal education, trainings or seminars and conferences with the provision of this policy and the responsible sourcing of precious metals.

As part of our Responsible Precious Metals Policy, **ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş.**is committed to:

1. Neither tolerate, contribute to, assist with or facilitate the commission of:

- Any forms of torture, cruel, inhuman and degrading treatment;
- Any forms of forced or compulsory labor;
- Illegal and/or unacceptable forms of child labor;
- Other human rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

2. Immediately suspend or discontinue engagement with our counterparty where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.

3. Support measures to build secure, transparent, fair-trade and verifiable gold supply chains from artisanal miners to market.

4. Never source from illegal mining operations

5. Not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals who:

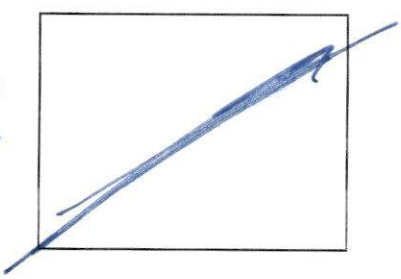
- Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain, and/or
- Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Illegally tax or extort intermediaries, export companies or international traders.

ÇAKMAKÇI KIYMETLI MADENLER SAN.VE TİC. A.Ş. require all its staff involved in the precious metals supply chain to strictly comply with this policy and implement it in the management system.

Contact Details:

For questions and/or concerns related to the supply chain policy, employees, stakeholders, and counterparties can send an email to **info@cakmakcikiymetlimadenler.com**

Acknowledgment:

We would like to thank the OECD for the Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict – Affected and High-Risk Areas to which parts of this policy is adapted.

ÇAKMAKÇI KIYMETLİ MADENLER
SAN. TİC. A.Ş.
Molla Fenari Mah. Nur-U Osmaniye Cad.
No: 58 / A Fatih / İSTANBUL
Tel: 444 75 11
Hocapaşa V.D. 225 113 33 48