



ISTANBUL GOLD REFINERY INC. SUSTAINABILITY POLICY

Doc. Code: PL-UY-06

Rev. Date: 15.09.2025

Rev. No: 005

1. PURPOSE AND SCOPE

The purpose of this policy is to regulate the sustainability policies of Istanbul Gold Refinery and the responsibilities of the institution to the environment, society and its business partners and stakeholders in the business world. All operations of Istanbul Gold Refinery are carried out in accordance with current laws and regulations. However, IGR undertakes to do more than these legal responsibilities and assumes a more comprehensive responsibility with a broader perspective to the environment, society, its shareholders and stakeholders and the business world.

2. POLICY STATEMENT

Our sustainability policy is based on environmental sustainability (good management)

- **Environmental sustainability;** It means minimizing the negative impacts of ourselves, our goods and service providers and our customers on the environment within the framework of responsible sourcing and making an active effort for a better environment.
- **Social sustainability;** Social sustainability means, as a responsible employer, contributing to social progress in the sector in which we operate, in society and, increasingly, in the world.
- **Corporate sustainability (good governance);** Corporate governance refers to implementing a sustainable business model with ethical rules and good business practices.

In addition to company policies, IGR considers complying with the country's environmental, health, safety and labor legislation, air, water and soil pollution, water management, and preventing unauthorized use of resources from world heritage sites and protected areas as important points of its policy.

IGR aims to implement a gold supply chain policy that includes the risks and risk management measures specified in the OECD due diligence guide (OECD annex II) included in the gold supply chain policy and takes care to address negative ESG factors in the refinery's primary gold supply chain.

2.1. Gold Industry Responsibility Statement and LBMA Sustainability Principles

As an LBMA accredited refinery, IGR accepts and implements the following sustainability principles in accordance with LBMA's gold industry responsibility statement.

1. Aligning gold industry practices and operations with responsible sourcing standards,
2. Support the advancement of the UN sustainable development goals (SDGs) by working with partners in government, industry and civil society.



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3. To respect human rights, including an absolute commitment to high safety and health standards, by aligning the activities of the gold industry with the United Nations labor and human rights guidelines and the fundamental workers' rights of the International Labor Organization.
4. Promoting diversity, equality and inclusion within our organization and across the sector, supporting the representation and participation of people of different genders, ages, races and ethnicities, abilities and disabilities, religions, cultures and sexual orientations.
5. Consider the impact of the gold industry's activities on indigenous peoples and other potentially vulnerable communities.
6. To improve understanding of the gold industry's impacts on climate change and to report on its position on climate change in line with the recommendations of the task force on climate-related financial disclosures (TCFD).
7. To work to reduce the greenhouse gas emissions of the gold industry in line with the goals of the Paris agreement.
8. Exploring opportunities to support the responsible artisanal and small-scale mining (ASM) sector, improve environmental, social and corporate governance performance and encourage closer engagement between ASGM actors and the official gold supply chain.
- 9 To encourage sector-wide participation and collaboration in the development and implementation of these principles.
10. To report progress in implementing these principles.

2.2. Environmental Sustainability

As IGR, our main goal in environmental sustainability is to minimize the negative impacts that we, our goods and service providers, and our customers have on the environment within the scope of responsible gold supply chain policies, and furthermore, to actively protect the environment

Within the main framework of our environmental policies that will ensure environmental sustainability.

2.3. Social Sustainability

As IGR, our main goal in social sustainability is to act as a responsible and good corporate citizen and to contribute to social progress in our society and the world.

IGR aims to provide a fair, safe, non-discriminatory and good working environment for all its employees. In this context, healthy management of workforce issues such as fair wages, appropriate working hours, non-discrimination, ensuring diversity and protection of workers are among our main priorities.



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- Air, water, soil pollution and incident management plans,
- Water management, especially water scarcity,
- Storage, transportation and disposal of hazardous chemicals, including mercury cyanide,
- Supporting labor-intensive small-scale mining (ASM) companies to use mercury safely and limit negative impacts on the environment, health and safety, and find alternative solutions to mercury,
- Aiming to actively reduce IGR's own environmental impact, energy use, waste management, chemical use, carbon emissions and increase resource efficiency. To support goods and service providers to apply the same principles on the same issues,
- Taking into account the unauthorized use of resources in world heritage sites and protected areas constitutes our important topics.

IGR aims to contribute to social progress with the participation of local communities. Protection of cultural heritage areas, indigenous people and vulnerable populations are on our agenda as important topics in terms of our supply chain practices.

The United Nations Declaration of Human Rights, the United Nations Global Compact, the ILO's declaration of fundamental principles and rights, and the OECD's anti-bribery regulations are among our sustainability references.

IGR also sees bringing the gold under the mattress into the economy for sustainable growth as a social responsibility project, and aims to continue to develop and continue its leading role in creating and developing this system for the Turkish and world markets with the systems, publications and suggestion sets it has developed for the return of the gold under the pillow to the economy.

2.4. Corporate Sustainability

One of our main goals is to ensure stable and efficient progress with good business practices. Having a strong code of ethical conduct, complying with the worldwide business ethics rules developed by LBMA and complying with the corporate code of conduct are priority issues for İAR.

Integrity forms the basis of İAR's corporate code of conduct.

3. RESPONSIBILITY AND AUTHORITY

This procedure is carried out by the Internal control and supply chain compliance officer.

4. APPLICATION

4.1. Sustainability Report

İAR aims to prepare a sustainability report annually and report on sustainability efforts. With this report, it aims to follow its development in sustainability, its performance status, the impact of these studies on its activities, and its environmental, social and corporate results.

İAR aims to identify key performance indicators on sustainability and monitor its performance in these indicators.



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4.2. Key Performance Indicators on Sustainability

IAR will determine key performance indicators on environment, social issues and corporate governance issues and monitor its progress in sustainability according to its development in these indicators.

- **Major key performance indicators on the environment;** Product carbon footprint, air and water pollution, recycling and waste management, water and energy security issues.
- **Major key performance indicators on social issues;** Corporate social responsibility, diversity and inclusion, responsible sourcing, sustainable supply chain, prevention of proceeds of crime and terrorist financing.
- **Main key performance indicators on Corporate Governance;** Management diversity, prevention of conflict of interest, stakeholder management issues.

5. ENFORCEMENT

This policy comes into force with the approval of the Board of Directors