

QUALITY POLICY

1. PURPOSE AND SCOPE

The purpose of this Policy is to establish the fundamental principles, management approach and corporate commitments of KÂR Katılım Altın Rafinerisi A.Ş. ("the Company") regarding the quality of its products and services.

This Policy aims to ensure that customer requirements, applicable statutory and regulatory requirements and relevant technical standards are fulfilled, that processes are carried out in a reliable and traceable manner, and that the quality management system is continually improved.

This Policy applies to all Company activities that may affect quality, including the acceptance, sampling, assaying, refining, production, packaging, storage and dispatch of precious metals, as well as after-sales processes.

Members of the Board of Directors, managers and employees, as well as contractors, service providers and suppliers acting on behalf of the Company, shall comply with this Policy to the extent applicable to the nature of their activities and within the Company's sphere of control or influence.

2. FUNDAMENTAL PRINCIPLES AND OUR COMMITMENTS

The Company adopts and commits to the following principles in its quality management activities:

- To identify and fulfil customer needs and expectations, contractual requirements and applicable statutory and technical requirements accurately and in a timely manner.
- To establish, implement, maintain and continually improve the quality management system certified to ISO 9001:2015 through a process-based and risk-based approach, and to operate customer satisfaction and complaint management processes certified to ISO 10002:2018 effectively.
- To ensure the integrity and traceability of critical transaction, assay, sampling, production and dispatch records from the acceptance of precious metals through to the delivery of the final product.
- To support the reliability of assay and measurement results through appropriate methods, competent personnel, verified or validated methods, and calibration and maintenance programmes.
- To define conformity criteria relating to product purity, weight, marking, packaging and customer requirements, and to perform the necessary verification controls.

- To control nonconforming products, processes and services and to implement root cause analysis, corrective actions and controls aimed at preventing recurrence.
- To assess customer suggestions, requests and complaints impartially, traceably and in a timely manner, and to use the results as input for continual improvement.
- To select, monitor and evaluate suppliers and external service providers based on quality, technical competence, ethical compliance, delivery performance and risk criteria.
- To ensure that employees possess the knowledge, skills and competence necessary to perform their duties and to enhance quality awareness through training and communication activities.
- To establish quality objectives and performance indicators, regularly review the results and take improvement actions where necessary.
- To maintain quality records in an accurate, accessible, protected and auditable manner and to implement the necessary controls against unauthorised alteration or loss.
- To uphold the principles of integrity, impartiality, customer confidentiality, responsible sourcing and legal compliance in all quality-related decisions.

3. DUTIES AND RESPONSIBILITIES

- The Board of Directors approves the Policy and provides the necessary oversight to ensure the effectiveness of the quality management system.
- General Management provides the organisational structure, authorities, human resources, technological infrastructure and other resources necessary for the implementation of the Policy.
- The function responsible for the quality management system establishes the relevant procedures, monitors objectives and performance indicators, coordinates nonconformities and corrective actions, and submits reports for management review.
- Managers responsible for the relevant functions identify quality risks and control points within their processes and are responsible for the accuracy of records and for ensuring that employees act in accordance with the provisions of this Policy.
- All employees comply with the quality requirements defined within the scope of their duties and report nonconformities, errors and improvement opportunities without delay.
- The internal control and compliance functions support control, advisory and monitoring activities relating to the implementation of the Policy within the scope of their respective duties.

4. MONITORING, RECORD-KEEPING AND FEEDBACK

4.1. Monitoring and Record-Keeping

- Quality performance is monitored through indicators relating to customer satisfaction and complaints, assay and product conformity, process errors, rework, supplier performance, delivery performance and corrective actions.
- Internal audits, management reviews and risk assessments are conducted, together with independent reviews or proficiency testing where necessary.
- Records relating to the implementation of the Policy are retained in accordance with the applicable retention periods and information security requirements.

4.2. Feedback

Reports involving suspected ethical violations or nonconformities, as well as questions, concerns or feedback regarding this Policy, may be submitted through the following communication channels:

Ethics and Whistleblowing Reports: etik@karaltinrafinerisi.com

Web Form: Ethics and Compliance Violations Reporting Form

Address: Yarımburgaz Mah., 1. Cumhuriyet Cad. No: 50, İç Kapı No: 1,
Küçükçekmece / İstanbul / TÜRKİYE

Reports are assessed in accordance with the principles of confidentiality, impartiality, personal data protection and protection against retaliation. No adverse action against any person who makes a report in good faith shall be permitted.

5. BREACHES AND SANCTIONS

Any conduct contrary to this Policy, the Company's policies and procedures, ethical principles or applicable legislation shall be considered a breach. Taking into account the nature, severity, recurrence and impact of the breach, as well as the status of the relevant party, necessary administrative, disciplinary, contractual and/or legal actions shall be applied.

For employees, appropriate disciplinary and administrative actions shall be taken within the framework of applicable labour legislation, employment agreements, ethical principles and the relevant internal regulations of the Company. For third parties, suppliers, customers, business partners, service providers and consultants, necessary actions shall be applied within the framework of the relevant contractual provisions, undertakings and Company procedures, including the suspension, restriction or termination of the business relationship.

Depending on the nature of the breach and applicable legislation, notifications shall be made to competent authorities, reports shall be submitted to regulatory bodies or referrals shall be made to administrative/judicial authorities where necessary. The Company does not tolerate retaliation against persons who make reports in good faith.

In situations that give rise to, or may potentially give rise to, a conflict of interest, employees, managers, members of the Board of Directors and relevant parties acting on behalf of the Company are required to disclose such situation in a timely manner and in writing. Conflict of interest declarations shall be obtained at least annually and on an event-driven basis through the Conflict of Interest Declaration Form; declarations received shall be recorded, monitored and retained confidentially by the Internal Control and Supply Chain Compliance Officer in the Conflict of Interest Declaration Register.

6. PUBLICATION AND TRANSPARENCY OF THE POLICY

This Policy is published and made accessible to relevant stakeholders through the Company's official website and appropriate communication channels. In line with the principle of transparency, the Company undertakes to keep the Policy publicly available, accessible and up to date.

Related Documents:

- Environmental Policy
- Occupational Health and Safety Policy
- Information Security Policy
- Precious Metals Responsible Supply Chain Policy
- Ethics and Compliance Violations Reporting Form
- Conflict of Interest Declaration Form
- Conflict of Interest Declaration Register

7. APPROVAL AND EFFECTIVENESS

This Policy was approved by the Board of Directors on 11/08/2026 and entered into force on the same date.

The Policy is reviewed by the responsible function at least once a year and additionally whenever there is a material change in applicable legislation, standards, the organisational structure, activities or the Company's risk profile.

In the event of any inconsistency, conflict or difference in interpretation between the English translation of this Policy and the Turkish text, the Turkish text shall prevail.

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