

HUMAN RIGHTS POLICY

1. Foreword

KÂR Katılım Altın Rafinerisi A.Ş. ("**Company**") recognizes respect for human rights as one of the fundamental elements of its ethical business conduct, sustainability approach and responsible supply chain management.

The Company observes applicable national and international standards in its activities and business relationships, particularly the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the ILO fundamental labour standards.

2. Introduction

This Human Rights Policy ("**Policy**") has been prepared to set out the Company's fundamental principles, commitments and expectations regarding human rights.

The Company acts with the awareness that its activities may have direct or indirect impacts on employees, customers, suppliers, business partners and other stakeholders. In this respect, the Company considers the establishment of a respectful, safe, fair, inclusive and responsible business environment as an integral part of its corporate governance approach.

As a precious metals refinery, the Company acknowledges that human rights risks are not limited to its own operations and may also arise within its supply chain, customer relationships, service providers and business partnerships. Accordingly, the identification, assessment, prevention, mitigation and, where necessary, management of human rights risks through corrective actions is essential.

This Policy is implemented together with the Company's ethical principles, compliance and internal control framework, responsible supply chain approach, occupational health and safety practices, employee rights framework and reporting mechanisms.

3. Purpose and Scope

The purpose of this Human Rights Policy is to define the Company's fundamental principles, commitments and expectations regarding human rights and to ensure the adoption of a respectful, safe, fair, inclusive and responsible approach in the Company's activities and business relationships.

The Policy sets out the Company's approach to identifying, assessing, preventing, mitigating and, where necessary, managing human rights risks through corrective and preventive actions. Within this scope, the Company prioritizes the prevention of

human rights violations in its own operations and precious metals supply chain, the protection of employee rights, compliance with occupational health and safety standards and stakeholders' access to safe reporting mechanisms.

This Policy applies to the Company's board members, executives, employees, customers, suppliers, business partners, service providers, subcontractors, consultants and all third parties acting on behalf of or in a business relationship with the Company.

The Policy applies to all operational processes of the Company, including precious metals sourcing, customer and supplier onboarding, production, refining, logistics, storage, sales, purchasing, security, human resources and other operational activities.

The Company expects all internal and external stakeholders to act in accordance with the principles and commitments set out in this Policy. In the event that a human rights-related concern is identified or a reasonable suspicion arises, the Company evaluates the matter in line with the principles of confidentiality, impartiality and due care, and ensures the implementation of corrective and preventive actions where necessary.

4. Definitions

Child Labour: Refers to work performed by children in a manner that may harm their physical, mental, social, moral or educational development.

Discrimination: Refers to any different, exclusionary or disadvantageous treatment of individuals based on language, religion, race, colour, gender, age, ethnic origin, nationality, marital status, family status, pregnancy, disability, political opinion, trade union membership or similar grounds.

Forced Labour: Refers to work performed involuntarily through threat, pressure, punishment, debt, restriction of freedom of movement or similar means.

Harassment: Refers to verbal, physical, psychological, written or digital conduct that violates a person's dignity or creates a disturbing, humiliating, degrading or hostile environment.

Human Rights: Refers to fundamental rights and freedoms based on human dignity, including the rights to life, security, equality, freedom, fair and safe working conditions, non-discrimination, freedom of association and freedom of expression.

Human Trafficking: Refers to the recruitment, transportation, harbouring or employment of persons for the purpose of exploitation through threat, coercion, deception, abduction, abuse of power or similar means.

Workplace Bullying (Mobbing): Refers to systematic psychological pressure, intimidation, exclusion, discrediting or similar adverse conduct directed at an individual.

Retaliation: Refers to any adverse treatment such as pressure, threats, discrimination, reassignment, exclusion or similar conduct against individuals who make a report in good faith or contribute to investigation processes.

Worst Forms of Child Labour: Refers to practices such as slavery, forced labour, human trafficking, involvement of children in illegal activities or work that is hazardous to their health and safety.

5. Legal and Regulatory Basis

This Policy has been prepared in consideration of the sector in which the Company operates, its business model and supply chain structure, within the framework of applicable national legislation, international human rights standards and responsible supply chain principles.

The main references of this Policy are as follows:

- Constitution of the Republic of Türkiye,
- Labour Law No. 4857 and related labour legislation,
- Occupational Health and Safety Law No. 6331 and related legislation,
- Personal Data Protection Law No. 6698,
- Universal Declaration of Human Rights,
- United Nations Guiding Principles on Business and Human Rights,
- United Nations Global Compact,
- United Nations Convention on the Rights of the Child,
- ILO Declaration on Fundamental Principles and Rights at Work,
- ILO Convention on the Worst Forms of Child Labour,
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas,
- Borsa İstanbul Precious Metals Market and responsible supply chain regulations.

The Company evaluates the implementation of this Policy in light of the above-mentioned regulations and standards, taking into account the nature of its activities, risk profile, supply chain structure and applicable legislation.

6. Fundamental Principles and Commitments

The Company undertakes to conduct its activities in accordance with human dignity, fundamental rights and freedoms, ethical principles and applicable legislation. The Company recognizes respect for human rights not only in relation to its own

operations, but also as a fundamental responsibility to be observed in relation to its customers, suppliers, business partners, service providers and all relevant parties within the precious metals supply chain.

The Company adopts a zero-tolerance approach towards torture, ill-treatment, forced labour, the worst forms of child labour, human trafficking, slavery, discrimination, harassment, workplace bullying (mobbing), widespread sexual violence, war crimes, crimes against humanity and other serious human rights violations.

In this regard, the Company undertakes to:

- create a respectful, safe, fair and inclusive working environment;
- provide equal opportunities to employees and prevent all forms of discrimination;
- respect employees' rights to freedom of association, unionization and collective bargaining within the framework of applicable legislation;
- reject forced labour, child labour, human trafficking and all forms of exploitative labour practices;
- provide safe and healthy working conditions by observing occupational health and safety standards;
- assess human rights risks in the supply chain through risk-based due diligence processes;
- establish mechanisms through which human rights-related concerns, violations or suspicions can be reported safely;
- prohibit retaliation against individuals who make reports in good faith;
- ensure the implementation of appropriate corrective and preventive actions to prevent, mitigate and remedy identified adverse impacts.

The Company expects all employees, executives and parties with whom it has business relationships to act in accordance with the principles and commitments set out in this Policy.

7. Working Life and Employee Rights

The Company considers it one of its fundamental responsibilities to ensure that its employees work in an environment that is dignified, safe, fair, inclusive and respectful.

The Company adopts equal and fair treatment in recruitment, remuneration, promotion, training, performance evaluation, disciplinary processes and termination of employment. Discrimination among employees based on language, religion, race, colour, gender, age, ethnic origin, nationality, marital status, family status, pregnancy, disability, political opinion, trade union membership or any similar ground is not permitted.

The Company respects employees' rights to freedom of association, unionization and collective bargaining within the framework of applicable legislation. Employees must not be subjected to pressure, discrimination or adverse treatment due to the exercise of these rights.

The Company adopts a zero-tolerance approach towards all forms of work that are contrary to human dignity, including forced labour, compulsory labour, bonded labour, human trafficking, slavery and the worst forms of child labour.

Harassment, workplace bullying (mobbing), psychological pressure, threats, ill-treatment, violence or any conduct that may undermine the dignity of employees is not tolerated in the workplace. Where such incidents are reported, the Company evaluates the matter in accordance with the principles of confidentiality, impartiality and due care.

The Company aims to foster a workplace culture where employees can express their views through appropriate channels, safely raise concerns and are protected from retaliation for reports made in good faith.

8. Occupational Health and Safety

The Company recognizes the health and safety of its employees, third-party personnel working at its premises and relevant stakeholders who may be affected by its activities as one of its primary responsibilities.

The Company acts in accordance with applicable national legislation, relevant standards and good practice principles in the field of occupational health and safety. It takes necessary measures to identify, assess and mitigate risks that may arise in refining, production, laboratory, storage, logistics, maintenance, security and other operational processes.

The Company implements necessary processes to ensure safe working conditions, prevent occupational accidents and diseases, provide employees with required training, ensure the use of personal protective equipment and strengthen emergency preparedness capacity.

Employees are encouraged to promptly report unsafe conditions, near-miss incidents, occupational accidents or concerns related to occupational health and safety. No retaliation, pressure or adverse treatment shall be applied to employees who make such reports.

The Company aims to regularly monitor its occupational health and safety performance, address non-conformities and continuously improve its safety culture.

9. Human Rights in the Supply Chain

The Company adopts the principle of establishing respectful, transparent, traceable and responsible business relationships in the precious metals supply chain.

The Company acknowledges that human rights risks may arise in relation to customers, suppliers, intermediaries, service providers, logistics companies, subcontractors and other business partners within the supply chain. Accordingly, a risk-based assessment approach is adopted in establishing and maintaining business relationships.

In sourcing connected to conflict-affected and high-risk areas, the Company takes into account the risks of forced labour, child labour, human trafficking, direct or indirect support to illegal armed groups, human rights violations committed by private or public security forces, widespread sexual violence, ill-treatment, bribery, corruption, money laundering, terrorist financing and false declarations regarding the origin of minerals.

For the identification and management of human rights risks in the supply chain, the Company applies customer and supplier onboarding processes, customer/supplier due diligence and KYC controls, sanctions and adverse media screening, assessment of origin and supply chain information, site visits, document reviews and, where necessary, additional due diligence measures.

Where a human rights-related concern is identified in the supply chain or a reasonable suspicion arises, the Company evaluates the matter in accordance with the principles of confidentiality, impartiality and due care, and ensures the implementation of corrective and preventive actions where necessary.

The Company expects its suppliers and business partners to act in compliance with this Policy, provide necessary information and documents for the prevention and mitigation of human rights risks and cooperate, to a reasonable extent, with assessment, monitoring and audit processes upon request.

10. 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.

11. Reporting, Grievance and Prevention of Retaliation

The Company attaches importance to ensuring that human rights-related concerns, violations, suspicions, opinions, suggestions or feedback can be submitted in a safe, accessible and confidential manner.

Employees, customers, suppliers, business partners and other stakeholders may report situations they consider to be contrary to human rights, including discrimination, harassment, workplace bullying (mobbing), ill-treatment, forced labour, child labour, occupational health and safety risks or supply chain-related human rights concerns, through the reporting channels designated by the Company.

The Company evaluates reports in line with the principles of confidentiality, impartiality, good faith and due care. During the review of reports, the Company pays attention to the protection of personal data, the rights of relevant parties and the fair conduct of the process.

Retaliation, pressure, threats, discrimination, reassignment, exclusion or any other adverse treatment against individuals who make reports in good faith or contribute to investigation processes is not tolerated.

Where a human rights violation is identified, the Company ensures the implementation of necessary corrective and preventive actions in accordance with its internal processes.

Questions, opinions, suggestions, concerns or feedback regarding this Policy may be submitted through the following channels:

Compliance Matters: compliance@karaltinrafinerisi.com

Ethics & Whistleblowing Notifications: 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

12. Authorities and Responsibilities

The ultimate oversight responsibility for the implementation of this Policy rests with the Board of Directors of KÂR Katılım Altın Rafinerisi A.Ş.

The Company's senior management is responsible for integrating a human rights-respecting business approach into the Company's activities, decision-making processes and business relationships.

The Internal Control and Supply Chain Compliance Officer, relevant process owners and senior management support the implementation of this Policy within their respective duties and responsibilities.

13. Training and Awareness

The Company conducts the necessary training and awareness activities to ensure that the principles, obligations and expectations set out under this Policy are understood, adopted and implemented by employees, managers and relevant parties. The Internal Control and Supply Chain Compliance Officer supports the planning, implementation and monitoring of the effectiveness of training activities.

Trainings are conducted regularly during the onboarding process and at least once a year. The training scope is determined to include ethics principles, conflicts of interest, anti-bribery and anti-corruption, human rights, prevention of discrimination and harassment, prohibition of retaliation, violation reporting channels, responsible supply chain principles, confidentiality, protection of personal data, and compliance with relevant policies/procedures. The training content may be expanded by taking into account the duties, responsibilities and risk profiles of the participants.

Training attendance records, training materials and, where necessary, measurement and evaluation results are recorded. Training activities are reviewed where needed, and additional information sessions or refresher trainings are organized where deemed necessary.

14. Record Keeping and Confidentiality

Records, training attendance lists, training materials, declarations, approvals, reports, review records, action tracking records, correspondence and relevant supporting documents created within the scope of this Policy shall be retained for at least eight (8) years.

The commencement date of the retention period shall be determined according to the type of record: the date of issuance for documents, the date of the last entry for books and records, and the date of the last transaction for documents and records related to identification, due diligence, supplier/third-party assessment or human rights due diligence processes.

Where a longer retention period is required under applicable legislation, or where there is an ongoing audit, review, investigation, litigation, administrative process or legal obligation, records may be retained until such processes are completed and the relevant retention obligations expire. Upon expiry of the retention period, records shall be deleted, destroyed or anonymized in accordance with applicable personal data protection legislation and the Company's data retention and destruction processes.

15. Review and Update

This Policy is reviewed at least once a year. The review process is carried out by taking into account the Company's activities, organizational structure, supply chain risks, human rights-related reports, internal control and audit findings, legislative changes and updates to relevant national and international standards.

The review and, where necessary, update of the Policy is conducted under the supervision of the Company's senior management, with the contribution of the Internal Control and Supply Chain Compliance Officer and relevant process owners.

In the event of material amendments to the Policy, the updated version is submitted to the Board of Directors for approval. The Company monitors the effectiveness of the Policy in line with its continuous improvement approach and ensures that necessary actions are taken.

16. Publication and Transparency of the Policy

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

Related Documents:

- Ethical Principles and Code of Conduct
- Whistleblowing Policy
- Precious Metals Responsible Supply Chain Policy
- Anti-Money Laundering and Counter-Terrorist Financing Policy
- Compliance, Risk Management and Internal Control Directive
- Personal Data Protection Notice

17. Approval and Effectiveness

This Policy was approved by the Board of Directors and became effective on 11/08/2026.

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

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