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Whistleblowing Policy

NADİR METAL RAFİNERİ

nadirmetal.com.tr

WHISTLEBLOWING POLICY

The Policy is designed to enable any employee, external stakeholder or similarly people involved in precious metals supply chain to raise concerns over the precious metals supply chain of the Nadir Metal Rafineri San. ve Tic. A.Ş. or any newly identified risk and disclose information about a suspicious wrongdoing and/or an illegal act with the aim of protecting public interest.

These concerns are include but are not limited to, the following:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or applicable laws;
- Human Rights abuses (including dangers to health and safety and child labour);
- Severe damage to the environment;
- Criminal activity;
- Improper conduct or unethical behaviour;
- Attempts to conceal any violations of the company policy regarding due diligence for supply chains of precious metals, i.e. the AML/CFT Policy or the Anti-Bribery and Anti-Corruption Policy;
- Falsification of documents or fraudulent suppliers and
- Direct or indirect violations of the Company Policy of the Nadir Metal Rafineri San. Tic. ve A.Ş. Regarding Due Diligence for Supply Chains of Precious Metals, the AML/CFT Policy or the Anti-Bribery and Anti-Corruption Policy.

Upon the discovery of any information regarding suspicion of serious malpractice or wrongdoing, any employee, external stakeholder or similarly people involved in precious metals supply chain should promptly disclose such information to etik@nadirmetal.com.tr or Internal Audit Department of the Nadir Metal Rafineri San. Tic. ve A.Ş. They are encouraged to report any suspicious activities and zero tolerance breaches taking place in the precious metals supply chain of the Nadir Metal Rafineri San. Tic. ve A.Ş. with supporting evidences.

Nadir Metal Rafineri San. Tic. ve A.Ş. promotes a honest and transparent approach, supports any employee or any person acting on behalf of Nadir Metal Rafineri San. Tic. ve A.Ş. who expresses his or her concerns in good faith and keeps reports confidential. Any employee is subject to ill-treatment (disciplinary action, removal from work, threats, mobbing, etc.) because he or she has reported in good faith a possible bribery or corruption that has been denied or is likely to occur in the event of a bribery or corruption. If an employee is exposed to such treatment because of his/her reporting to etik@nadirmetal.com.tr or the Internal Audit Department as such kind of a situation is unacceptable for Nadir Metal Rafineri San. Tic. ve A.Ş.

In situations that are or may be contrary to this policy, the matter shall be examined by the Risk Committee and necessary sanctions shall be applied in case of determination of the inappropriate behaviour.

This policy has entered into force with the decision of the Board of Directors dated 20/04/2018.