ALTINBAŞ KIYMETLİ MADENLER BORSASI A.Ş.

BORSA ISTANBUL (BIST) COMPLIANCE REPORT

This report and the tables and comments in this report summarize the compliance activities of Altınbaş Kıymetli Madenler Borsası A.Ş. in accordance with the requirements of Borsa Istanbul's (BIST) Responsible Gold Supply Chain Guide.

TABLE 1: REFINERY DATA

NAME OF INTERMEDIARY AGENCY	: Altınbaş Kıymetli Madenler Borsası A.Ş.
ADDRESS	: Osmangazi Mahallesi 3117 Sokak No:3/2 Esenyurt-Istanbul
REPORTING PERIOD	: 1 January 2021 – 31 December 2021
REPORT DATE	: 01 March 2022
RESPONSIBLE MANAGER FOR THIS REPORT	: Hüseyin Hazır (huseyinhazir@onsarafineri.com)

ASSESSMENT OF ALTINBAŞ KIYMETLİ MADENLER BORSASI A.Ş.:

Responsible gold supply is very important for Altınbaş Kıymetli Madenler Borsası A.Ş. As a BIST-registered intermediary agency, it attaches importance to the supply of "clean gold" by doing business in line with the national market and relevant legislation, as well as OECD and LBMA directives and guides for responsible gold understanding and working with suppliers or customers who do business or undertake to do business with the same logic.

TABLE 2: SUMMARY OF ACTIVITIES CARRIED OUT TO DEMONSTRATE COMPLIANCE WITH THE LEGISLATION

Step 1: CREATING A STRONG COMPANY MANAGEMENT SYSTEM

Compliance Statement:

We are fully compliant with step one (Building a strong company management system).

Does the company have a policy regarding gold supply chain due diligence?

Compliance Indicator and Comments:

As Altınbaş Kıymetli Madenler Borsası A.Ş., the Company's Gold Supply Chain Policy was developed and put into practice in accordance with BIST's Responsible Gold Supply Chain Guide and OECD's Compliance Guide for Responsible Supply Chain in the reporting year of 2017. The Company's Responsible Gold Chain Policy was adopted in 2021 within the framework of changing and updated legislation and needs, and our Company's Responsible Gold Chain Policy was updated. The process of monitoring the control and operations of the entire supply chain process, analyzing and evaluating risks within the framework of company policy principles, and acceptance of customers and precious metals containing gold was operated in accordance with the principles of customer acceptance policy.

Has an appropriate internal management structure been established to support the due diligence of the gold supply chain?

Compliance Indicator and Comments:

Within the scope of the Company's Gold Supply Chain Policy, our company is responsible for the implementation of the know-your-customer principles, the traceability of transactions, the archiving and storage of information and documents, the transportation of gold, the necessary controls regarding the trade, and the provision of necessary internal and external trainings. In this context, an internal management structure has been developed in accordance with the principles of the Company's Gold Supply Chain Policy, a Compliance Officer has been appointed and a Compliance Unit has been established for this purpose. A non-compliance reporting system was established and the senior management was given the opportunity to report directly. The chain of activities and practices suitable for the operability of the Compliance process was followed by identifying appropriate internal communication systems and providing trainings.

Has a strong internal system of the company been established, covering the identification of all actors in the supply chain and due diligence regarding the transparency, control and traceability of supply chain processes?

Compliance Indicator and Comments:

Altınbaş Kıymetli Madenler Borsası A.Ş. identifies all existing and new suppliers and customers in the supply chain and records the necessary information and documents. According to the risk assessment guide, in order for gold to be accepted and processed, the customer/supplier must first complete the know-your-customer process and be approved. With the CRM system, meeting and visit reports of customers and suppliers in the gold supply chain, risk assessment records, documents provided within the scope of know-your-customer principles and other documents are stored.

A systematic structure has been established for the traceability of all transactions, from the acceptance of the customer and the goods to the production and sales stages, on a transaction basis with the reference code, and the follow-up of the process has been ensured.

Do Suppliers make efforts to ensure that customers comply with company policies and procedures within the scope of supply chain due diligence?

Compliance Indicator and Comments:

Within the scope of the due diligence, the relevant documents, documents and forms prepared in accordance with the OECD Guideline and Borsa Istanbul (BIST)'s Responsible Gold Supply Chain Guidelines were shared with our customers compliance agreements were signed with customers and their statements were received, and determinations and risk assessments were made on supply chain processes and compliance, both through customer interviews and on-site visits.

Has a broad-based internal communication system been established with the participation of all company employees in identifying risks in all processes of the gold supply chain and reporting non-compliances to senior management?

Compliance Indicator and Comments:

Altınbaş Kıymetli Madenler Borsası A.Ş. has a whistleblowing policy that allows all stakeholders (customers, suppliers, employees, etc.) in the supply chain to tell about unexpected risks and all kinds of doubts and reservations. In this context, the e-mail address etik@altinbaskiymetlimadenler.com has been created in order to share information and findings, as well as incompatibilities identified during the gold supply chain process.

STEP 2: IDENTIFICATION AND ASSESSMENT OF RISKS IN THE SUPPLY CHAIN

Compliance Statement:

We are fully compliant with step two (Identification and assessment of risks in the supply chain).

Is there a process for identifying risks in the gold supply chain?

Compliance Indicator and Comments:

The company's Risk Management Plan and Customer Acceptance Policy have been established in order to identify the risks in the gold supply chain process and take precautions, and to prevent the recurrence of similar risk situations by implementing corrective actions in this direction. This policy is regularly reviewed in line with developments and needs and updated when necessary.

Are risks assessed within the framework of the standards of the due diligence system?

Compliance Indicator and Comments:

In accordance with the Responsible Gold Supply Chain Guide and procedures of Borsa Istanbul (BIST), the supply chain due diligence system and measures have been put into practice, starting with the acceptance phase of customers and precious metals containing gold.

A risk-based due diligence process has been established, starting from the source of gold, and accordingly high-level risk situation assessment has been made for gold from high-risk areas such as conflict-affected regions, areas where human rights are violated, individual mining areas, and procedures have been put into practice to ensure the control and supervision of the system, including the monitoring of transportation routes and all processes related to the process.

Is the risk assessment reported to management?

Compliance Indicator and Comments:

A company Compliance Committee has been established regarding the supply chain compliance process. The decisions taken by the compliance committee and the results of the risk assessment are reported to the senior management.

STEP 3: DESIGN AND IMPLEMENTATION OF A MANAGEMENT SYSTEM TO MEET THE IDENTIFIED RISKS

Compliance Statement:

We are fully compliant with step three (Designing and implementing a management system to meet the identified risks).

Has an appropriate risk management strategy been identified, such as discontinuing business engagement in risk situations and risk management, mitigating risk by suspending trading, or mitigating risk while continuing to trade?

Compliance Indicator and Comments:

The Company's Risk Management Plan has been prepared and put into practice, and risky situations, the course of action in risk situations and risk management principles have been determined, and risk-taking methods such as discontinuing the business relationship in risky situations, mitigating the risk by suspending the trade or mitigating the risk while continuing the trade have been established. All customers/suppliers and their transactions are evaluated regularly and reported to the senior management when deemed necessary.

Are the practices related to risk reduction measures such as periodic re-evaluation of risks, observing parts of the process related to risky situations and implementing additional measures, reporting the evaluations to the senior management periodically?

Compliance Indicator and Comments:

Within the framework of risk analysis and Customer Acceptance Policy, applications have been prepared in such a way that all transactions in the process, including the transportation phase and transit routes, are followed from the source of gold, the relevant customer documents and documents have been recorded and examined within the scope of the Customer Acceptance Policy, periodic reports were made to the senior management, if necessary, the risk assessment was clarified with on-site audits and additional administrative practices, and measures were taken to ensure the safe continuation of the business relationship or the acceptance of goods.

STEP 4: AGREEMENT WITH THE INDEPENDENT AUDITOR FOR SUPPLY CHAIN DUE DILIGENCE

Compliance Statement:

We are in full compliance with step four (contracting the independent auditor for supply chain due diligence).

Compliance Indicator and Comments:

A contract was signed with PKF Istanbul-Aday Bağımsız Denetim SMMM A.Ş as an independent audit company for the compliance assessment of the 2021 Compliance process. The independent audit report can be viewed on the company website at www.altinbaskiymetlimadenler.com.

STEP: 5 SUPPLY CHAIN DUE DILIGENCE REPORTS

Compliance Statement:

We are fully compliant with the annual reporting of step five compliance efforts.

Compliance Indicator and Comments:

The Company's supply chain policies and procedures, prepared in accordance with Borsa Istanbul's (BIST) Responsible Gold Supply Chain Guide and procedures, were shared with all elements and customers in the process, efforts were made to ensure their compliance with the process, and the annual Compliance Report was published and shared with third parties. Relevant reports and documents can be accessed from the company website at www.altinbaskiymetlimadenler.com.

Assessment:

Is it in compliance with the requirements of BİST's Responsible Gold Supply Chain Guidance in the reporting period of 2021?

Yes. As a result, Altınbaş Kıymetli Madenler Borsası A.Ş. has implemented effective management systems and processes to comply with the requirements of BIST's Responsible Gold Supply Chain Guidance, as explained in this report, for the 2021 reporting year ending on 31/12/2021.

Altınbaş Kıymetli Madenler Borsası A.Ş. undertakes to fulfill its obligations and to constantly review and update its internal controls in this context.

01/03/2022

Hüseyin Hazır

Board Member