ALEKS METAL RAFİNERİ ANONİM ŞİRKETİ INDEPENDENT ASSURANCE REPORT IN ACCORDANCE WITH INTERNATIONAL STANDARD ON ASSURANCE ENGAGEMENTS (ISAE 3000) FOR THE PERIOD 1 JANUARY 2025-31 DECEMBER 2025

Independent Reasonable Assurance Report to Aleks Metal Rafineri Anonim Sirketi (ISAE 3000 Engagements)

To the Board of Directors of

Aleks Metal Rafineri Anonim Sirketi

We are authorized by the Board of Directors of Aleks Metal Rafineri Anonim Sirketi (A.S)./ ("Company") to provide assurances on Company's Responsible Precious Metals Supply Chain Compliance Report ("Compliance Report") for the period 1 January 2025- 31 December 2025.

Responsibilities

The management of the Company is responsible for the preparation and presentation of the Company's Compliance Report in accordance with the model set out in the Annex II of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance and Borsa Istanbul's (BIST) "**Responsible Precious Metals Supply Chain Compliance Guidance**". This responsibility includes establishing appropriate risk management and internal controls from which the reported information is derived. The criteria identified by the management as relevant for demonstrating compliance with the Guidance are the activities described within the Company's Compliance Report. This responsibility is prepared in such a way that the Precious Metals Supply Chain Policy does not contain any material errors arising from errors and/or fraud and irregularities, it includes the design, implementation and maintenance of the necessary internal control system to ensure that it honestly reflects reality.

Our responsibility is to carry out a reasonable assurance engagement in order to express a conclusion based on the work performed. We conducted our assurance engagement in accordance with **"International Standard on Assurance Engagements ISAE 3000 Assurance Engagements other than Audits or Reviews of Historical Financial Information"** issued by international audit and Borsa Istanbul's (BIST) **"Responsible Supply Chain Legislation"**

This report has been prepared for Aleks Metal Rafineri Anonim Şirketi for the purpose of assisting the management in determining whether Aleks Metal Rafineri Anonim Şirketi has complied with the model set out in the Annex II of the OECD Due Diligence Guidance and Borsa Istanbul's (BIST) Responsible Precious Metals Supply Chain Compliance Guidance and for no other purpose. Our assurance report is made solely to the Company in accordance with the terms of our engagement. We do not accept or assume responsibility to anyone other than the Company for our work, or for the conclusions we have reached in the assurance report.

Independent Reasonable Assurance Report to Aleks Metal Rafineri Anonim Şirketi (ISAE 3000 Engagements) (Continued)

Inherent Limitations

Non-financial information, such as that included in the Company's Compliance Report, is subject to more inherent limitations than financial information, given the more qualitative characteristics of the subject matter and the methods used for determining such information. The methods used by Company to comply with the Guidance may differ. This will also have a significant impact on comparability. Accuracies of different measurement techniques can also vary. In addition, the methods used in determining such information and the nature of the work and the measurement techniques and accuracy used may change over time. It is important to read the Company's Independent Assurance Report in the frame of company's methodology and current precious metals supply chain policy available on the Company's website: (https://www.aleksmetal.com/compliance)

Independence and Perfection Declaration

We have complied with the Code of Ethics for Professional Accountants issued by the international Ethics Standards Board far Accountants, which includes independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. in accordance with international Standard on Quality Control, we maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. Our independent assurance report has been carried out by a team of experts who have expertise in reporting the Precious Metals Responsibility Policies and the Precious Metals Supply Chain system.

Opinion

In our opinion, the Aleks Metal Rafineri Anonim Şirketi.'s Compliance Report for the period 1 January 2025 - 31 December 2025 and presented on 21 March 2026, in all material respects, describes fairly the activities undertaken during the year to demonstrate compliance, and management's overall conclusion contained therein is in accordance with the requirements of BIST's "**Responsible Precious Metals Supply Chain Compliance Guide**".

Görüş Bağımsız Denetim A.Ş.

Burhan GÜNDOĞDU
Yeminli Mali Müşavir
Sorumlu Denetçi

İSTANBUL

15 June 2026

ALEKS Metal Rafineri Joint Stock Company
Precious Metals Responsible Supply Chain Compliance Report

Purpose

Upon the recommendation of FATF (*Financial Action Task Force*), the OECD (*Organisation for Economic Co-operation and Development*) developed the "*Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*"; based on this Guidance, Borsa Istanbul (BIST) prepared and published the "Borsa Istanbul A.Ş. Precious Metals Responsible Supply Chain Compliance Guide". This Report has been prepared in accordance with BIST's "Responsible Gold Supply Chain Guide" in order to set out the high standards established by **ALEKS Metal Rafineri Anonim Şirketi (Company - ALEKS)** for combating systematic and widespread human rights violations, avoiding business relationships with or intermediation of transactions for parties that contribute to financial resources supporting regional conflicts and terrorism, preventing proceeds of crime and the financing of terrorism, and mitigating risks.

ALEKS Metal Rafineri Joint Stock Company (Company - ALEKS) established a "Responsible Precious Metals Supply Chain Guide" in accordance with the "**Precious Metals Responsible Supply Chain Compliance Guide**" published by Borsa Istanbul (BIST) on 5 March 2021.

This report analyses the compliance of ALEKS's activities and practices with BIST's **Precious Metals Responsible Supply Chain Compliance Guide**.

COMPANY INFORMATION	
Company Name	ALEKS Metal Rafineri A.Ş.
Address	IKITELLI OSB MAHALLESİ MARMARA, P BLOK NO:11, 34307 KUCUKCEKMECE ISTANBUL
Reporting Period	1 January – 31 December 2025
Report Date	21 March 2026
Responsible Senior Management	Sarp Tarhanacı – Chairman of the Board
Phone No.	+90 212 448 66 00
Website	www.aleksmetal.com

In this Report, which was prepared under the **Precious Metals Responsible Supply Chain Compliance Guide** for identifying and preventing risks in ALEKS's supply chain, establishing strong company management systems to prevent these risks, and having the process audited by third parties, explanations are provided regarding the Five-Step Rule set forth in the Responsible Gold Supply Chain Guide. These steps are:

- **Step I:** Establishment of Strong Company Management Systems
- **Step II:** Identification and Assessment of Risks in the Supply Chain
- **Step III:** Design and Implementation of a Strategy to Respond to Identified Risks
- **Step IV:** Independent Third-Party Audit of the Compliance Efforts of Precious Metals Intermediary Institutions and Refineries (Independent Assurance Report)
- **Step V:** Annual Reporting of Supply Chain Compliance Efforts.

Step I: Establishment of Strong Company Management Systems

Compliance statement:

We are fully compliant with Step I (Establishment of Strong Company Management Systems).

Compliance Indicator and Comment

ALEKS has adopted and put into effect a company policy compatible with the following in order to establish a strong company management system:

- FATF Recommendations,
- OECD "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas",
- BIST Precious Metals Responsible Supply Chain Compliance Guide,
- United Nations (UN) Resolutions,
- European Union Decisions,
- Financial Crimes Investigation Board (MASAK) regulations

A risk-based due diligence assessment has been performed and, in line with the Responsible Precious Metals Supply Chain Policy, all supply chain processes have been operated, controls and transactions have been monitored, risks have been analysed and assessed, customer due diligence principles have been applied, and full compliance has ultimately been achieved by establishing a strong company management system.

Step II: Identification and Assessment of Risks in the Supply Chain

Compliance statement:

We are fully compliant with Step II (Identification and Assessment of Risks in the Supply Chain).

Compliance Indicator and Comment

ALEKS has developed and implemented a **Precious Metals Supply Chain Policy** within the framework of BIST's Precious Metals Responsible Supply Chain Compliance Guide. Under this policy, in addition to gathering intelligence information specific to potential clients against the risks identified under the heading "High-Risk Criteria in the Precious Metals Supply Chain", differentiated questionnaires and similar information-gathering methods have been applied for individuals, corporations, precious metals businesses and companies operating in other fields.

Intelligence work concerning clients has been updated periodically, and additional information/documents have been requested in extraordinary circumstances. The management, compilation and recording of these processes under Customer Relations have made the process systematic. All meeting notes, information and documents from the first meeting with a client through to the current status are recorded digitally, creating a substantial cumulative dataset. Within this data, a reference account number is assigned for each client/supplier, and acceptance/rejection processes as client/supplier and, following acceptance, commercial processes are systematically monitored and analysed.

Step II: Identification and Assessment of Risks in the Supply Chain (Continued)

The Risk Committee regularly carries out monitoring, analysis and determinations against the risks identified under the heading "High-Risk Criteria in the Precious Metals Supply Chain" and reports to senior management. High-risk cases arising from the existence of risks or possibilities set out in the Company Policy under the heading "High-Risk Criteria in the Precious Metals Supply Chain" are evaluated by the Risk Committee.

The Risk Committee may reject a potential client/supplier or accept it for business. Following acceptance of the client/supplier, a risk mitigation plan to be managed by compliance officers may be prepared due to risks that may arise during the business process, and its results may be monitored; trading may be suspended or completely terminated.

Step III: Design and Implementation of a Strategy to Respond to Identified Risks

Compliance statement:

We are fully compliant with Step III (Design and Implementation of a Strategy to Respond to Identified Risks).

Compliance Indicator and Comment

Implementation of Know Your Client (KYC) Principles

ALEKS tracks all meeting notes, risk analyses, Know Your Client documents and records relating to all relevant clients/suppliers on the basis of Customer Account Number, and keeps a copy of all documents in secure cloud infrastructures.

With its system, while transactions are monitored on a client-by-client basis, depending on the level of risk and the decisions to be taken by the Risk Committee, an account may be deactivated, frozen or blacklisted.

Appointment, Effectiveness and Activity Reports of Compliance Officers

The compliance officers of ALEKS are responsible for implementing the Precious Metals Supply Chain Policy, prepared within the framework of BIST's Precious Metals Responsible Supply Chain Compliance Guide, within the operational processes.

In this scope, on 1 July 2021 the Company decided to establish a Risk Committee to monitor compliance activities and to make client acceptance and rejection decisions. In this decision, the initial members of the Risk Committee were appointed and assigned the task of drafting its own regulation.

The members of the Risk Committee are as follows:

1. Sarp Tarhanacı
2. Tunca Cingöz
3. Zeynep İdil Özbal

Step III: Design and Implementation of a Strategy to Respond to Identified Risks (Continued)

The Risk Committee carried out the necessary work and implemented the following important practices:

- It prepared the Risk Committee Regulation and obtained approval from the Board of Directors for its authority and scope of activities.
- It prepared the Responsible Precious Metals Policy and obtained approval from the Board of Directors.
- It prepared the Customer Acceptance and Risk Assessment Regulation and obtained approval from the Board of Directors.
- It instructed and implemented the necessary actions for evaluating the companies currently working with the Company within the framework of the above-mentioned regulations and practices and for determining whether business should continue.

An e-mail address, compliance@aleksmetal.com has been created so that everyone can share their opinions, information and findings regarding the Precious Metals Supply Chain Policy and compliance matters, as well as unexpected risks. Members of the Risk Committee are responsible for monitoring and evaluating the information submitted through this channel and taking action when necessary.

Step IV: Independent Third-Party Audit of the Compliance Efforts of Precious Metals Intermediary Institutions and Refineries

Compliance statement:

We are fully compliant with Step IV (Independent Third-Party Audit of the Compliance Efforts of Precious Metals Intermediary Institutions and Refineries).

Within the framework of the Precious Metals Supply Chain Policy prepared in accordance with BIST's Precious Metals Responsible Supply Chain Compliance Guide, our Company has entered into an agreement with the independent audit firm Görüş Bağımsız Denetim ve Yeminli Mali Müşavirlik A.Ş. for the compliance assessment. The independent audit report will be published on ALEKS's website at:

https://www.aleksmetalrafineri.com/uyum

Step V: Annual Reporting of Supply Chain Compliance Efforts

Compliance statement:

We are fully compliant with Step V (Annual Reporting of Supply Chain Compliance Efforts).

Compliance Indicator and Comment

ALEKS prepares the **Precious Metals Responsible Supply Chain Compliance Report** annually and publishes it on its corporate website in order to inform the public about the work carried out to determine the current compliance level of the responsible supply chain.

ALEKS
METAL RAFİNERİ

ALEKS Metal Rafineri Joint Stock Company
Precious Metals Responsible Supply Chain Compliance Report (Continued)

Conclusion and Compliance Statement

The activities carried out by ALEKS Metal Rafineri Joint Stock Company in its capacity as a precious metals intermediary institution are performed in compliance with each step of the five-step approach set out in the Borsa Istanbul Responsible Supply Chain Compliance Directive.

For the period 1 January 2025 – 31 December 2025, regarding the transactions carried out within the scope of the Company's precious metals activities, no significant control deficiency or non-compliance with legislation has been identified by the units within the Company's internal systems.

ALEKS Metal Rafineri Joint Stock Company Compliance Statement for the Steps within the Scope of the Five-Step Approach	
Step I: Establishment of Strong Company Management Systems	**YES**
Step II: Identification and Assessment of Risks in the Supply Chain	**YES**
Step III: Design and Implementation of a Strategy to Respond to Identified Risks	**YES**
Step IV: Independent Third-Party Audit of the Compliance Efforts of Precious Metals Intermediary Institutions and Refineries **(Independent Assurance Report)**	**YES**
Step V: Annual Reporting of Supply Chain Compliance Efforts	**YES**
GENERAL COMPLIANCE STATEMENT	**YES**

Responsible Senior Management Compliance Statement,

Our Company's operational processes are fully compliant with our **Precious Metals Supply Chain Policy**, prepared within the framework of BIST's Precious Metals Responsible Supply Chain Compliance Guide, in terms of the identification and prevention of risks in the supply chain, the establishment of strong company management systems to prevent these risks, and the audit of the process by third parties.

While we are conscious of developing and improving ourselves within the framework of our Responsible Precious Metals Supply Chain Policy, we are also striving to create this awareness among the other companies in our supplier and customer chain.

ALEKS Metal Rafineri Anonim Şirketi

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Ticaret Sicil No: 876265-0

Sarp TARHANACI
Chairman of the Board

Istanbul
21 March 2026