

HUMAN RIGHTS, MODERN SLAVERY AND CHILD LABOUR PREVENTION POLICY

UĞURAS PRECIOUS METALS INDUSTRY AND FOREIGN TRADE INC.

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1. Purpose

The purpose of this Policy is to ensure respect for human rights in all activities carried out by Uğuras Precious Metals Industry and Foreign Trade Inc. (“Uğuras”), to establish the Company’s institutional approach to preventing modern slavery practices and child labour, and to define the fundamental principles and obligations aimed at safeguarding human rights standards across all business relationships, including its supply chain.

Uğuras recognizes that sustainable and ethical business practices extend beyond compliance with legal obligations. They also require the protection of human dignity, the respect of fundamental rights and freedoms, and the conduct of economic activities in accordance with principles of social responsibility.

The Company adheres to internationally recognized human rights standards, including Article 18 of the Constitution of the Republic of Türkiye and Article 4 of the European Convention on Human Rights. Uğuras also aligns with the ILO Forced Labour Convention (No. 29), ILO Abolition of Forced Labour Convention (No. 105), ILO Minimum Age Convention (No. 138), and ILO Worst Forms of Child Labour Convention (No. 182).

Furthermore, the Company acts in accordance with internationally recognized frameworks such as the Modern Slavery Act 2015, OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.

Uğuras adopts a zero-tolerance approach to modern slavery, forced labour and child labour and considers ensuring dignified working conditions across its operations and supply chain as an integral part of its corporate responsibility.

2. Scope

This Policy applies to all activities of Uğuras and establishes principles applicable to the Board of Directors, managers, employees, consultants, suppliers and business partners.

The Company expects all stakeholders within its commercial relationships to operate in accordance with internationally recognized human rights standards. In particular, in global precious metals supply chains, Uğuras conducts appropriate reviews and assessments to mitigate risks that could lead to human rights violations.

Uğuras conducts its activities with institutions and partners that operate in compliance with London Bullion Market Association (LBMA) standards.

3. Definitions

Human Rights: Fundamental and inalienable rights and freedoms inherent to all individuals, including the right to life, liberty and security, fair working conditions, protection from discrimination, education and a life consistent with human dignity.

Modern Slavery: A broad term referring to situations where individuals are exploited through coercion, threats, restriction of movement or debt bondage. This includes forced labour, human trafficking, debt bondage and forced marriage.

Forced Labour: Work or services extracted from a person under threat or coercion and not offered voluntarily, as defined under ILO Forced Labour Convention No. 29.

Child Labour: Work that deprives children of their childhood, education or potential and harms their physical or mental development. International standards are set by ILO Convention No.138 and ILO Convention No.182.

Supply Chain: The network of entities involved in the extraction, processing, refining, trading and distribution of products, including precious metals supply chains.

Due Diligence: Risk-based processes through which companies identify, assess, prevent and mitigate potential human rights or ethical risks in their operations and supply chains.

4. Principle of Respect for Human Rights

Uğuras recognizes respect for human rights as a fundamental component of sustainable business conduct. The Company aims to create a corporate culture that protects the fundamental rights and freedoms of employees and stakeholders and implements preventive measures to ensure that its activities do not directly or indirectly lead to human rights violations.

This approach aligns with the United Nations Guiding Principles on Business and Human Rights. Accordingly, Uğuras evaluates human rights risks and implements corporate procedures to mitigate or eliminate such risks.

5. Prevention of Forced Labour and Modern Slavery

Uğuras does not tolerate any form of modern slavery including forced labour, human trafficking or debt bondage. The Company follows internationally recognized standards including the Constitution of the Republic of Türkiye Article 18, ILO Convention No.29 and ILO Convention No.105.

Practices such as confiscation of identity documents, coercion, forced labour or threats are strictly prohibited.

6. Prevention of Child Labour

Uğuras recognizes the elimination of child labour as a key component of its human rights commitment. The Company adheres to ILO Minimum Age Convention No.138 and ILO Worst Forms of Child Labour Convention No.182.

The Company expects suppliers and partners to follow the same standards and may request declarations confirming compliance with these conventions prior to establishing business relationships.

7. Non-Discrimination and Respectful Workplace

Uğuras adopts equal and fair treatment of employees as a fundamental corporate principle. Discrimination in recruitment, compensation, promotion or working conditions is not tolerated.

Discrimination based on gender, age, ethnicity, nationality, language, religion, disability or similar factors is prohibited. The Company also commits to providing a safe, respectful and harassment-free working environment.

8. Responsible Gold Sourcing and Supply Chain Management

As a participant in the precious metals market accredited within Borsa Istanbul Precious Metals Market, Uğuras recognizes the importance of responsible sourcing practices.

In this context, Uğuras conducts processes aimed at identifying and preventing risks that may lead to human rights violations within its gold supply chain, taking into consideration internationally recognized frameworks such as the London Bullion Market Association Responsible Gold Guidance and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, which promote responsible business practices in precious metals supply chains.

Uğuras encourages suppliers to adopt responsible business practices and may request documentation to verify compliance with responsible sourcing standards.

9. Risk Assessment Processes

Uğuras adopts a risk-based approach to preventing human rights violations. Risk assessment processes are conducted in accordance with the OECD Due Diligence Guidance framework.

The Company prepares Responsible Supply Chain Compliance Reports annually in alignment with the OECD five-step framework.

10. Reporting and Monitoring Mechanisms

Uğuras supports the establishment of communication channels through which employees and stakeholders may report potential human rights violations.

Reported issues are reviewed where necessary and corrective actions are implemented. The Company also conducts internal audits and compliance reviews and provides regular training to employees on human rights related matters. For this purpose, the Company has adopted and implemented a Whistleblowing Policy.

11. Review of the Policy

This Policy enters into force upon approval by the Board of Directors and applies across all operations of the Company.

The Policy is periodically reviewed in light of international human rights standards, sector developments and relevant legislation, and may be updated when necessary.