

Scope: Modeling and Design of Jewelry with Gold and Silver Precious Metals – Production, Sale and Export

1. Policy Statement

Golden Planet is committed to responsible, ethical, and transparent sourcing of gold in line with international standards and best practices.

The company sources gold exclusively from refiners accredited under the LBMA Good Delivery List, ensuring that all gold is sourced from refiners that comply with the LBMA Responsible Gold Guidance (RGG), which is fully aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and Annex II Model Supply Chain Policy.

In accordance with the Responsible Jewellery Council (RJC) Code of Practices (COP) 2024, Golden Planet acknowledges its responsibility to maintain its own management systems, due diligence processes, and risk oversight related to gold sourcing.

2. Purpose and Applicability

The purpose of this policy is to:

- Define Golden Planet's commitment to responsible gold sourcing
- Ensure compliance with **OECD Annex II**, **LBMA Responsible Gold Guidance**, and **RJC COP 2024**
- Identify, prevent, and mitigate risks related to gold sourcing
- Communicate sourcing expectations to employees, suppliers, and business partners

This policy applies to:

- All gold purchased, processed, sold, or used by Golden Planet
- All employees and management involved in procurement, production, sales, and compliance
- All business relationships related to gold sourcing

3. LBMA-Only Gold Sourcing Commitment

Golden Planet sources gold **only from LBMA Good Delivery refiners**.

As part of this commitment:

- All refiners must be listed on the **LBMA Good Delivery List** at the time of purchase
- LBMA accreditation status is verified at least annually
- Any change in supplier status triggers a review and escalation

LBMA-accredited refiners are subject to independent audits under the **LBMA Responsible Gold Guidance**, which incorporates OECD Annex II requirements.

4. Alignment with OECD Annex II – Zero Tolerance Commitments

Golden Planet adopts a **zero tolerance approach** to the following practices, in line with **OECD Annex II**:

- Forced, bonded, or compulsory labour
- Child labour
- Human trafficking and modern slavery
- Torture, cruel, inhuman, or degrading treatment
- Sexual violence
- War crimes, crimes against humanity, or genocide
- Direct or indirect support to illegal armed groups
- Bribery, corruption, money laundering, and tax evasion

Golden Planet will not knowingly source gold linked to any of the above practices.

5. Due Diligence and Risk Assessment

5.1 Risk Identification

Golden Planet conducts a **risk-based due diligence review** of its gold sourcing, considering:

- LBMA refiner accreditation and audit status
- Country and geographic risk indicators
- Any publicly available adverse information

Given the LBMA-only sourcing model, gold sourcing is assessed as **low risk**, subject to periodic review.

5.2 Risk Mitigation and Escalation

If any red flags are identified, Golden Planet will:

- Request clarification or additional documentation
- Suspend sourcing pending investigation
- Escalate the issue to senior management
- Terminate the relationship where risks cannot be mitigated

6. Chain of Custody and Traceability

Golden Planet maintains documentation to ensure traceability of gold purchases, including:

- Supplier identification and LBMA status
- Purchase invoices and delivery documentation
- Material descriptions and quantities

Records are retained in accordance with legal and RJC requirements.

7. Grievance Mechanism

Golden Planet provides accessible and confidential channels for reporting concerns related to gold sourcing and supply chain integrity.

Reports may be submitted via:

- **Email:** compliance@goldenplanet.com.tr
- **Web Hotline:** www.goldenplanet.com.tr/hotline

Reports can be submitted anonymously and without fear of retaliation.

8. Training and Awareness

Golden Planet ensures that:

- Relevant employees receive training on responsible gold sourcing
- This policy is communicated internally and to relevant business partners
- Awareness is maintained regarding OECD Annex II risks

9. Governance and Responsibilities

Senior management is responsible for:

- Oversight of this policy
- Ensuring effective implementation
- Annual review of gold sourcing risks

The compliance function maintains records and monitors ongoing compliance.

10. Monitoring, Review, and Continuous Improvement

This policy is reviewed at least annually or when:

- LBMA standards change
- RJC COP requirements are updated
- Gold sourcing arrangements change

Golden Planet commits to continuous improvement of its responsible sourcing practices.

11. Non-Compliance

Failure to comply with this policy may result in:

- Corrective actions
- Disciplinary measures
- Termination of business relationships

12. Conclusion

This Responsible Gold Sourcing Policy reflects Golden Planet's commitment to ethical sourcing, transparency, and responsible business conduct.

By sourcing gold exclusively from **LBMA Good Delivery refiners** and maintaining internal due diligence systems, Golden Planet ensures compliance with **OECD Annex II** and **RJC Code of Practices 2024** while contributing to a responsible and sustainable global gold supply chain.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Golden Planet Kuyumculuk Dış Ticaret Limited Şirketi



PREPARED AND APPROVED BY GOLDEN PLANET BOARD OF DIRECTORS