

Fiscal Year: 2024–2025 Issue Date: 01.01.2026

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1. Introduction and Scope

This Due Diligence Report forms an integral part of Golden Planet’s RJC Annual Responsible Business Conduct Report (2024–2025) and outlines the company’s approach to identifying, assessing, preventing, and mitigating risks related to its operations and supply chain.

The scope of this report covers all activities related to:

- **Modeling and Design of Jewelry with Gold and Silver Precious Metals**
- **Production, Sale, and Export**
- **All upstream and downstream supply chain relationships**

Golden Planet sources gold exclusively from LBMA Good Delivery refiners, and applies a risk-based due diligence system in line with RJC COP 2024 and OECD Due Diligence Guidance.

2. Due Diligence Framework

Golden Planet implements the OECD Five-Step Due Diligence Framework,

as required under RJC COP 6.

Applicable Standards:

- OECD Due Diligence Guidance
- OECD Annex II Model Supply Chain Policy
- RJC Code of Practices 2024

3. Step 1 – Establish Strong Management Systems

Golden Planet has established management systems to support responsible sourcing and due diligence, including:

- **Approved Responsible Gold Sourcing Policy (LBMA-only, Annex II aligned)**
- **Supply Chain Compliance & Sustainable Procurement Policies**
- **Designation of a CEO-appointed RJC Representative**
- Supplier contractual clauses covering ethical conduct, human rights, and compliance
- Recordkeeping systems for supplier data, sourcing documentation, and risk reviews
- **Whistleblower & Grievance Mechanism** accessible to internal and external stakeholders

These systems are reviewed annually by senior management.

4. Step 2 – Identify and Assess Risks in the Supply Chain



Golden Planet conducts risk identification and assessment across its supply chain, focusing on:

- Human rights risks (forced labour, child labour, discrimination)
- Conflict financing and armed group involvement
- Corruption, bribery, money laundering, and sanctions risks
- Environmental and occupational health & safety risks

Risk Assessment Methodology

- Verification of **LBMA Good Delivery status** of gold suppliers
- Review of supplier self-assessment questionnaires
- Country and geographic risk screening (CAHRA analysis)
- Monitoring of publicly available adverse information

Risk Profile (2024–2025)

- Gold sourcing assessed as **Low Risk**, due to LBMA-only sourcing model
- No high-risk suppliers identified
- No confirmed Annex II red flags detected

5. Step 3 – Design and Implement a Risk Management Strategy

Where potential risks are identified, Golden Planet applies the following measures:

- Engagement with suppliers for clarification and remediation
- Development of corrective action plans (CAPs) where applicable
- Escalation of significant risks to senior management
- Suspension or termination of business relationships in cases of severe or unmitigable risk

2024–2025 Outcome

- No supplier relationships required suspension or termination
- No unresolved corrective actions outstanding

6. Step 4 – Independent Third-Party Review Golden Planet relies on:

- Independent third-party audits conducted under **LBMA Responsible Gold Guidance** for upstream gold refiners
- Internal compliance reviews aligned with RJC COP requirements

Audit outcomes and confirmations are documented and retained as part of the due diligence records.

7. Step 5 – Reporting and Transparency

Golden Planet ensures transparency through:

- This **Due Diligence Report**
- Inclusion of due diligence outcomes in the **RJC Annual Responsible Business Conduct Report**
- Internal management reviews and documented decisions

Key due diligence findings are communicated to relevant stakeholders as appropriate.

8. OECD Annex II Compliance Statement

Golden Planet confirms that during the reporting period it:

- Did not tolerate or engage in forced or child labour
- Did not provide direct or indirect support to armed groups
- Did not engage in bribery, corruption, money laundering, or terrorist financing
- Complied with all applicable UN sanctions and national laws

No Annex II violations were identified in the supply chain.

9. Grievance Mechanism and Remediation

Golden Planet maintains accessible grievance channels for reporting due diligence-related concerns:

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

During the 2024–2025 period:

- No substantiated supply chain grievances related to gold sourcing were received
- All reports received were reviewed in accordance with internal procedures

10. Continuous Improvement

Golden Planet is committed to continuous improvement of its due diligence system through:

- Annual review of risk assessments
- Monitoring changes in RJC, OECD, and LBMA standards
- Ongoing training and awareness programs



11. Conclusion

This Due Diligence Report demonstrates Golden Planet's effective implementation of a risk-based due diligence system in line with RJC COP 2024, OECD Due Diligence Guidance, and Annex II. Through LBMA-only sourcing, strong management systems, and continuous monitoring, Golden Planet ensures that its supply chain remains ethical, transparent, and low risk.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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