



AHLATCI KUYUMCULUK SAN.VE TİC.A.Ş.  
CUSTOMER ACCEPTANCE POLICY

Prepared	Controlling	Approver	Approval date
Bekir HANÇERLİ Compliance Officer	Ahmet Emin AHLATCI CEO	Ahmet AHLATCI Chairman of the Board	31 JANUARY 2025

## CUSTOMER ACCEPTANCE POLICY

## KNOW YOUR CUSTOMER AND RISK ASSESSMENT PROCEDURE

## 1. DEFINITIONS

In this policy;

**Ministry:** Ministry of Treasury and Finance,

**BIST, Stock Exchange:** Borsa Istanbul Joint Stock Company,

**Company:** Ahlatcı Kuyumculuk San.veTic. A.Ş.

**Holding:** Ahlatcı Holding Anonim Şirketi which has 100% share of the company,

**OECD:** Organization for Economic Development and Cooperation

**Laws:** Law on Prevention of Laundering Proceeds of Crime No. 5549, dated 11 October 2006, and Law No. 6415 on Prevention of Financing of Terrorism, dated 07 February 2013,

**Regulation:** Regulation on the Program of Compliance with Obligations Regarding the Prevention of Laundering Proceeds of Crime and Financing of Terrorism , dated 21 May 2007 ,

**Directive: Borsa İstanbul Precious Metals and Precious Stones Market Operations Directorate** Directive on Internal Control System and Compliance Principles of Precious Metals Intermediary Institutions and Refineries with the code 31.YÖN.04 and dated 05 March 2021 ,

**Standard: World Gold Council** Uncontested Gold Standard dated 01 November 2012 ,

**BIST Compliance Guide:** Borsa Istanbul Precious Metals Responsible Supply Chain Compliance Guide dated March 05, 2021,

**OECD Compliance Guide:** Borsa Istanbul Turkish Third Edition, 2018 , OECD Compliance Guidelines for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas,

**Policy:** Company Internal Control and Supply Chain Compliance Policy,

**Training Program:** The program created for the training activities that the company will carry out within itself and with its customers in order to comply with the relevant Laws, Regulations, Directives, Standards and Exchange Compliance Guide and OECD Guide regulations,

**Compliance:** As an integral part of the company's commercial decision-making and risk management systems, it enables the company to identify, prevent, reduce and account for the actual and potential negative effects arising from its activities and supply systems. proactive and reactive process that ensures the execution of

**Compliance Officer:** The Directive; Internal Control and Supply Chain Compliance Officer who meets the conditions specified in Article 11, who is appointed as specified in Article 12, and who has the duties, authorities and responsibilities specified in Article 13,

**Compliance Committee:** The governing body defined in Article 3 of the Policy,

**Compliance Directive:** The document created by the company in line with the policy, regulating the working principles of the compliance unit,

**Recognition of the Party You Do Business Rule (İYTT):** It is the business process that identifies and validates the identity of business relationships and aims to identify facts in order to clearly understand the nature and history of the relationship.

**Customer Acceptance Policy:** The policy created by the Company within the framework of the İYTT rules specified in the Laws, Regulations, Directives and Guides,

**Supplier:** Person or organization involved in the supply chain for the supply of precious metals and items containing precious metals.

**Supply Chain:** It is the system that covers all activities, organizations, actors, technologies, information, resources and services involved in the process of transporting the precious metal from its source to the end consumers. Any reference to the supply chain, supplier or suppliers in this Guide includes customers, suppliers, agents, intermediaries and other relevant persons and organizations involved in the supply of precious metals to the obligatory member or refinery.

**Supply Chain Risk Management Plan:** The document that provides detailed information on the management of risks that may be encountered in the supply chain created by the company and defines the methods,

**Compliance Program:** The cycle that expresses the stages of Customer Acceptance, Know Your Customer, Due Diligence, Internal Control, Risk Management, Training Program, Reporting and Notifications, Assurance Audit,

**Status Evaluation:** Activities carried out for the purpose of recognizing the natural or legal persons or institutions that do business in accordance with the Customer Acceptance Policy,

**Assurance Engagement:** Audits to be performed in accordance with Assurance Engagement Standard 3000 Independent Audit of Historical Financial Information or Other Assurance Engagements Except Limited Independent Audits published by the Public Oversight, Accounting and Auditing Standards Authority ,

It expresses.

## 2. GENERAL :

( *money laundering* ) by the company itself and its employees . *laundering* ) and financing of terrorism ( *terrorism* ) *In order to protect it from being the target of violation of national and international laws and practices such as financing* ) in the purchase and customer acceptance processes related to precious metals, the customer **recognition system procedures** ( **Know your Customer -KYC procedures** ) and **Customer Acceptance Policy** ( **Customer Acceptance policy** ) applies.

**Compliance** transactions and procedures within **the** scope of the supply chain process are meticulously followed up and implemented by all personnel, and the transactions carried out by the **Compliance Unit** are also monitored and audited.

The Company accepts the principle that precious metals come from legitimate and ethical sources, do not constitute any criminal element, are not associated with armed conflict or human rights violations, in the activities in which it participates, cooperates and develops in the supply of precious metals in the sense of gold refining .

**Customer Acceptance Policy** , which have been put into practice in order to protect the company and its employees from being the target of national and international legal rules, money laundering and terrorist financing violations, are based on the following main parameters:

- a. Country of origin of the metal,
- b. The risk of doing business with the customer,
- c. The risk of the product or the service provided,
- d. The value of the business transactions and the type/duration of the relationship with the customer.

profile is updated at least once a year. The risk profiles of recurring customers are updated as a result of a more comprehensive examination such as **regular company visits at** different periods and **checking the validity of administrative procedures** .

administrative procedures , clients are required to provide at least evidence of:

- a. Detailed description of business and activity areas,
- b. References from other companies in the industry to be questioned and confirmed by the compliance officer,
- c. Detailed evidence of the origin of the goods.

### **3. SCOPE AND IMPLEMENTERS:**

This instruction is in line with the Gold Supply Chain risks in the **Gold Supply Chain Customer Due Diligence ( Due Diligence )** processes, **Customer Definition System** requirements and how the Risk Analysis in this direction will be made and is applied by all commercial units of the Company .

### **4. RISK MANAGEMENT:**

The company ., with all its units , ***money laundering (Money laundering ) , financing of terrorism ( Terrorism ) financing ) and other related crimes*** , it has adopted the principle of supporting all national and international efforts, complying with all national and international laws and other legal regulations and legislation.

For this purpose, the company is risk -based. ***“Customer recognition methods procedures – Know your Customer KYC procedures - Customer Due Diligence ”*** aims to effectively and accurately manage the supply chain process and risks.

By applying ethical business principles in accordance with the requirements of legal and national and international certifications to which it is subject, all commercial relations with its customers are carried out to **prevent money laundering (anti-money laundering) . laundering )** and **financing of terrorism ( terrorism )** ) makes an effective risk analysis and management effort in order not to become a company involved in money laundering or the financing of terrorism and other related crimes, and to eliminate the risk of damage to its commercial reputation, by carrying out measures and methods that will prevent it .

The Company carries out internal and external audits within the framework of monitoring and control activities through the Compliance Unit and the Compliance Committee in order to raise awareness of all its personnel in this direction, to refresh the information with the trainings provided, and to monitor and control the practices.

#### Identification of Risks in the Gold Supply Chain:

Company OECD's Situation Assessment of Conflict-Affected and High-Risk Areas ( Due Diligence ) Guidelines , and to meet the requirements of the London Bullion Market Association (LBMA) and Dubai Miscellaneous Commodity Center (DMCC) , by implementing the Company's Gold Supply Chain Responsibility Policy , an effective internal management system and risk control methods in this direction. has adopted.

A supply chain tracking system has been established in which the supply chain information of each refined lot is collected and stored, the information is recorded and stored, the information and practices related to the subject are refreshed from time to time with personnel trainings, a Compliance Officer is determined for each unit and all Situation Evaluation ( Due Diligence ) processes are based on initiating appropriate and effective methods.

Situation assessment ( Due Within the scope of Diligence ), the documents required to be taken from customers and official documents are determined, procured via customer information form and following the necessary examinations, customer risk assessment is made and the practice of deciding whether to start a commercial relationship has been put into effect. The initial risk assessment in the supply chain begins with the identification of the source of the gold supply . Different risk assessments are made for different sources.

In order to be able to make an effective risk assessment, starting from the first point of departure from which the gold is procured, the company requires a detailed identity scan of the customer and documentation of its business and commercial **relations . Laundering , fraud , or supporting terrorism ( terrorism )** It investigates whether there are any illegal tendencies and efforts such as **financing )** , business and financial data are checked and details are reached, mining license for gold coming from both mines and small-scale enterprises, mining capacity, data on mining applications, documents determining the origin of the mine, gold import/ develops customer risk analysis with additional documents such as export licenses . It takes additional measures for its customers in the high risk category

and, if necessary, conducts on-site visits and additional research, and as a result decides whether to start trading.

The company definitely requires an officially approved, notarized power of attorney for customers who come into contact with it, and reports the situation to the relevant authorities when any fraud or deception attempt is detected.

*Customers to start a commercial relationship; Cases such as refraining from submitting the necessary documents, procuring gold from countries or centers with suspicious status by OECD, UN and other relevant institutions, not being able to document the source of the mine, trying to transfer large amounts of money, and not wanting to carry out their transactions through the bank, registered and documented, are considered in the category of suspicious transactions.*

follow up the risks that may occur during the transportation of precious metals , documents such as weights, transportation and insurance documents are requested and checked, and thus the transportation phase of the goods is also followed.

in the supply chain is **considered High Risk**. It is **accepted and** followed up, and regular customer visits are made every year to determine whether to continue the business relationship.

**a. risk of the source of the mine / gold :**

According to the information obtained as a result of the country inquiry ( [www.countrywatch.com](http://www.countrywatch.com) ), the goods coming from that customer or country are accepted or rejected . The source of the mine is absolutely verified in every transaction to eliminate or reduce the risk in the trade to be made.

Risky countries are constantly monitored by the Compliance Unit, taking into account existing or potential embargoes, bribery, Financial Action Task Force (FATF) rankings, and political stability, If the result of the evaluation is negative or doubtful, the incoming gold is either not accepted directly or is accepted or rejected after passing the control of the Compliance Officer .

**b. Customer's risk:**

Except for known private investors related to gold investment products (investment bars, nuggets, etc.), services are not provided to individuals who **privately** trade precious metals/metals.

The company risks doing business **with non bona fide persons** . It only works with clients who do business professionally, minimizing It also does not work with customers who employ child labor contrary to local laws.

During the evaluation of the forms, a risk profile (low risk, medium risk or high risk) is defined for each customer and it is regularly revised.

For this purpose, a reference number (ID) is given to each customer with whom a commercial relationship will be started, and transactions are initiated and a customer file containing the forms and documents required to be declared is kept. In the ERP system used, a current card is opened and introduced to the system with its ID number, and all commercial transactions of that customer and precious metals undergoing refining are monitored by lot and serial numbering system.

If there is an irregular increase in the amount of the precious metal routinely purchased from regular customers, additional due diligence on the identification of the gold's source and the plausibility of the customer's disclosure. diligence ) is made and the decision is made.

company and customers are monitored and followed by the Compliance Officer, and the functionality of the Customer Acceptance Policy is checked. The results of these observations are reported to the board of directors every 3 months. As a result of this reporting, if necessary, the risk profile of the customer is re-evaluated and revised. With the external audits carried out every year, the Compliance Process audit and reporting of the company for the previous year is carried out.

**c. Guarantee that it is not related to illegal activities:**

Customers must ensure that they are not associated with illegal means such as money laundering and tax fraud. With all the precious metals under their control, they must verify the origin of the money . The client must also demonstrate compliance with local laws regarding the use of child labor.

Even the slightest doubt in the above-mentioned matters requires that the relationship with that customer be terminated immediately or not started at all.

**d. The risk of the service provided:**

Every purchased item is subject to strict scrutiny by the Company . All transactions are subject to goods purchase and compliance procedures . First-time clients must go through a full acceptance process. A separate compliance program is also applied for existing/permanent customers.

Regular customers, who are decided to accept goods on a regular basis , are subject to an on-site internal audit by the Company . In these on-site inspections, in terms of administrative procedures , customers must at least provide additional evidence, such as a detailed description of the business and the source of the goods.

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Risk Categories	Describing	Applicable Situation Evaluation ( Due Diligence ) level
low risk A  Low risk (Low profile client)	Gold that originates from clean and safe areas and whose shipping routes are safe.  <i>Customers with good documents and records</i> <i>Risk-Free-Safe zones/countries</i>	Basic level . ( basic Due Diligence )
medium Risk B  Medium Risk (Medium profile client)	Gold coming from conflict-affected and high-risk areas and whose shipping routes pass through risk areas Large amounts of undocumented, unregistered business transactions <i>Customers who make reasonable and good faith efforts</i> <i>Low risk-Partly safe zones/countries</i>	advanced ( enhanced due diligence )
High Risk C  High risk (High profile client)	Gold coming from conflict-affected and high-risk areas and whose shipping routes pass through risk areas Large amounts of undocumented, unregistered business transactions <i>Customers who are suspected of making reasonable and good faith efforts</i> <i>High Risk-Unsafe areas/countries</i>	advanced ( enhanced due diligence )

Country/Customer and Product Based Risk Classification

5. CUSTOMER ACCEPTANCE PRINCIPLES:

information, documents, references, adjustment results, etc. given by accepting a batch of sample goods from the customer who has decided to start a commercial relationship . activities and transactions are followed on the basis of the following, and in case of any inconsistency, the Compliance Officer is contacted immediately. With the [world - check](http://www.world-check.com) application [www.world-check.com](http://www.world-check.com) , the identity of the customer is verified, in addition to the administrative procedures, on-site visits and inspections are made when necessary (including the existence of mining, refining or production facilities, the accuracy of the capacity and market information offered by the customer, the situations where the customer is an intermediary . confirmation of the information on the spot) is investigated and confirmed whether the findings are correct . As a result of all these, it is decided whether the trade with that country or customer will continue. If, as a result of the on-site audit, it is seen that the documents and information presented and the issues determined in the audit match, this customer is put into a regular/permanent customer status and it is decided to trade regularly.



All professional clients must declare the following documents and fill out the client information form:

1. Passport photocopy ( color ) - **minimum**
2. Identity photocopy ( colour ) - **minimum**
3. Proxy if notary certified power of attorney - **minimum**
4. The company's last financial status showing documents
5. Bank accounts showing documents
6. The company's latest electricity bill
7. Precious metal dealer license
8. Mining license
9. Gold import / export license
10. Documents on the weight of the precious metal
11. Documentation of the setting results - **minimum**
12. Commercial registration documents
13. Partnership structure
14. Activity with fields relating to documents
15. Company official with representatives relating to documents
16. Mine its capacity about information
17. Mining applications about information / document

After the forms and documents are received, their control and verification is done. If the customer or company cannot be verified, the transactions are stopped immediately and the service is terminated.

**In case of doubt:**

In case of doubt, the compliance officer requests additional documents and information for identification verification, and if there is no problem in the authentication as a result of the control, the procedures are continued.

If, as a result of the control, the suspicion remains and verification cannot be made, the transactions are stopped and the trade with that customer is terminated.

**Customer identification stages:**

**Step 1:** Business Customers who want to communicate over the internet in order to initiate a relationship can use the Company's *Customer Recognition System (Knowledge System)* . *your Before starting the process of Customer -KYC* transactions, he /she fills in the *Customer Preliminary Information Form ( Pre -KYC form)* on the [www.ahlatcimetal.com](http://www.ahlatcimetal.com) website , [signs](#)

it, passes the document through the scanner, and adds the required additional documents on the **Compliance website. Contact Form ( Compliance Contact Form)** and communicates with the Compliance Unit via e-mail. **Customer Preliminary Information Form** (Turkish-English) It is in Appendix A.

**Step 2: If the information in the** Customer Preliminary Information Form is compatible with the Company 's policies and procedures, the **Customer Information Form** containing all the documents related to the customer recognition system and detailed information for the customer to fill in and open an account as a result of the evaluation. **(KYC form)** is sent. **Customer Information Form (Turkish-English) Appendix-B** is . The customer attaches the relevant documents to the form and sends them to the company or delivers them by hand.

Full Situation Assessment ( Due Diligence ) and Risk analysis processes take approximately 5-10 working days. **Using World - Check** ( [www.world-check.com](http://www.world-check.com) ) all customers are authenticated and a country inquiry ( [www.countrywatch.com](http://www.countrywatch.com) ) is made to investigate the source of the gold, and as a result, a comprehensive risk assessment is made about that customer and the source of the gold.

After deciding whether to establish a business relationship with the customer and informing the customer of the result, the transactions are started. All this information of the customer is kept confidential and confidential within the framework of ethical rules. Information that should not be shared is not shared with third parties or institutions. All these processes are followed and controlled by the Company's Compliance Officer and the relevant Unit Compliance Officer. Identity documents, references, analysis results, etc. Unless all the information given is verified, the goods cannot be accepted from the customer. In case of inconsistency in documents and information, the Compliance Officer is informed by the fastest way or by using the Compliance waypoints system.

**Step 3: Full Due Diligence** Following the diligence ) transactions, a current card is opened for each customer and a reference number ( customer ID) is given. All transactions are tracked in the system with this reference number ( customer ID) as of customer acceptance, gold-containing precious metals that are refining belonging to the customer are monitored in accordance with the lot numbering system, and all commercial transactions, refining and outputs as a result of production of gold or gold-containing precious metals are matched with each other . be made traceable in a compatible manner. All these stages of the process are controlled by the internal audits carried out by the relevant units and the Compliance Committee .

**Compliance Agreement Form** with customers who are accepted into commercial relations ( **Agreement Form**) is signed, Company 's **Compliance procedures , Gold Supply Chain Responsibility Policy and Due Diligence Declarations** of compliance with the **Diligence ) transactions are received. Compliance Agreement Form ( Compliance Agreement Form)** is in Annex-C. The **Customer Declaration Form** , in which the customers from which scrap is purchased from the counters, will declare the source of the goods, is in Annex-D.

## 6. SOURCE OF THE MINE/GOLD:

(whether the goods are savings, inheritance, etc.) both at the goods purchase/receiving counters and at the stage of starting a commercial relationship within the framework of the customer recognition system , and they must give clear and clear answers to these questions ..

**The high amount and value of the transactions also means that the risk is high, and the follow-up and verification of the transactions in the process is of such high importance.**

According to the information obtained as a result of the country inquiry ( [www.countrywatch.com](http://www.countrywatch.com) ), the goods coming from that customer or country are accepted or rejected . The origin of the mine is verified in every transaction.

If the evaluation results are consistent with the customer's notifications about the source of the gold, the customer's evaluation phase is terminated and the goods are accepted.

If there is an inconsistency between the evaluation results and the customer's notifications about the source of the gold, the relevant customer representative calls the Compliance Officer and asks for help in the evaluation.

- a. **Investment gold or special gold** : The accuracy of the explanations and documents of customers who want to sell goods to the Company for one time is well researched and confirmed . Small amount of investment goods such as ornaments, liras, bars; If it is considered that the customer's explanations regarding the origin of the goods are reasonable and proportional to the first statements (savings, inheritance property, etc.), they are purchased directly from the purchasing counter.
- b. **Scrap gold** : The source of the gold in the hands of customers who want to sell one-off goods to the Company is determined and evaluated during the interview with the customer. If necessary, the setting and analysis results of the goods to be purchased are also checked and it is determined whether the goods are within the scope of jewelery according to the ratio of silver and copper in it.
- c. **Gold from conflict zones / hotspots:**

If the source of the goods offered by the customer is from areas defined as conflict zones by the United Nations (UN) or OECD, goods coming from those countries and in some declared risk situations (except for the approval of other official organizations such as the United Nations or OECD) are not accepted.

If any customer declares to have goods from such regions, if the investigations point to that region, or in all suspicious cases, the Compliance Officer should be contacted.

- d. **In case of doubt:**

In doubtful cases, the Compliance Officer should be consulted. In this case, the compliance officer requests additional documents and information for identification verification, and if there is no problem as a result of the control and evaluation, the proceedings are continued.

If, as a result of the control, there is still doubt about the source of the good/gold and verification cannot be made, the transactions are stopped and the trade with that customer is terminated.

e. **Regular customers:**

Company regularly accepts metals/gold are called regular customers. Customers who are decided to accept goods on a regular basis are subject to internal audit by the Company .

These audits take the form of more extensive administrative procedures and regular company visits. In terms of administrative procedures in these on-site audits , clients are required to provide evidence of at least the following:

1. Detailed description of business and activity areas,
2. References from other companies in the sector to be questioned and confirmed by the compliance officer,
3. Detailed evidence of the origin of the goods,
4. Evidence and documentation of non-use of child labor.

After the verification process, sample goods can be accepted. If the information provided and those determined as a result of the on-site inspection are compatible, that customer/company is put in the status of regular customer and trading is started.

Although it is accepted as a regular customer, periodic customer visits are not interrupted and the verification of customer information is carried out at the same intervals.

All process work flow charts are attached.

**7. INTERNAL CONTROL MECHANISMS:**

**Compliance Notification System has been established** as a communication mechanism through which any non-compliance that is foreseen to be considered as a risk within the gold supply chain process will be conveyed to the senior management, and for this purpose, **Compliance Access Points have been established. ( Compliance Access Point)** was created. Awareness is raised through planned personnel compliance trainings held throughout the year, and the information is refreshed. The implementation of the procurement process stages in the relevant units, the procedures and processes to be carried out, the disruptions and possible risks in the compliance system and supply chain are taken under control, and negative developments are reported by the identified unit compliance officers.

The company has also established an internal audit system with its customers who have continuous commercial relations. It controls the customers to whom it accepts goods at regular intervals, with administrative practices and on-site field audits, at different periods throughout the year, and carries out the risk audit of the trade.

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In this context, customers;

- a . Confirmation of detailed explanations of their activities as a company,
- b . Conducting research and confirming the information by the Compliance Officer with the companies they report as references,
- c . Confirmation of detailed documents to prove the origin of the goods,
- d . Supervision and control are carried out on the issue of guaranteeing that child labor is not used.

**8. METHOD OF APPLICATION:**

**Customer Acceptance Policy ( Customer Acceptance Policy )** takes effect as soon as it is published. Possible changes **Compliance Officer ( Compliance Officer )** together with the revision number. Unit leaders/managers are responsible for ensuring that the principles and implementation of this directive are well understood by all unit employees, establishing a functioning style that will fulfill the requirements of the instruction and procedure , and making in-unit practices related to the subject.

Prepared	controlling	approver	Approval date
Bekir HANÇERLİ Compliance Officer	Ahmet Emin AHLATCI CEO	Ahmet AHLATCI Chairman of the Board	31 JANUARY 2025

## AHLATCI KUYUMCULUK SAN.VE TİC. A.Ş. COMPLIANCE UNIT

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### CUSTOMER PRELIMINARY INFORMATION FORM:

**1. General Money Laundering policies and procedures :**

Has your business/institution established written policies and procedures to combat “Money Laundering” and “Financing of Terrorism” and are these policies and procedures applicable to all branches, subsidiaries and operations?

YES NO

**2. Customer Recognition System and Due Diligence Diligence ) procedures :**

Your business/institution uses a Customer Recognition System and customer Situation Assessment ( Due ) to recognize the customers with whom you have commercial relations. Diligence ) procedures ? YEAH NO

Is your business/institution subject to regular audits by independent auditors on these issues?

YES NO

**3. Gold Responsibility procedures :**

procedures to meet the requirements set out below ?

a. London Bullion Market Association (LBMA) Gold Responsibility Guidelines YES NO

b. Dubai Miscellaneous Commodities Center (DMCC) Gold Responsibility Guide YES NO

c. OECD's Supply Chain Due Diligence and Gold Supplement Guidelines for Conflict-Affected and High-Risk Minerals YES NO

**4. Annexes: (List with the original name and code of the document or document, if available, add the appropriate format if possible.)**

Gold responsibility guide  
 Procedures to prevent money laundering and terrorist financing  
 Last 2 inspection reports  
 Compliance procedures

**5. Business Information:**

Company name:

Contact point name and role:

Address:

E-mail /Web address: Phone number :

Date / Signature:

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All the above information is correct and that this information Ahlatcı Exchange ve Kıymetli Madenler Yönetim Müessesesi A.Ş. I declare that I approve the registration of .

Annex-A continuation

### PRE – KNOW YOUR CUSTOMER SELF DECLARATION FORM

#### 1. General AML policies , practices and procedures

our entity has clearly established written policies and procedures designed to combat money laundering and the financing of terrorism according to to AML related local and international laws and these policies are applicable to all our branches , subsidiaries and operations

yes no n /a

#### 2. Know your customers and due diligence procedures

our entity has implemented processes for the identification of those customers on whose behalf we maintain or operate accounts or conduct transactions

yes no n /a

our entity is regularly audited by independent AML auditors

yes no n /a

#### 3. Responsible gold procedures

our entity has established policies and procedures designed to meet and implement the following rules and guidelines :

a. LBMA Responsible Gold Guidance

yes no n /a

b. DMCC Responsible Gold Guidance

yes no n /a

c . OECD Due diligence Guidance for responsive Supply Chains of Minerals from Conflict Affected and High Risk Areas and Supplement on Gold

yes no n /a

#### 4. Attachments ( if applicable , please write document or procedure number , and attach a copy if needed )

AML/CFT policy and procedures

last two audited reports

responsible gold policy

compliance procedures

#### 5. Business Information

Company name:

Name of contact point :

Address :

E-mail /Web address

## AHLATCI KUYUMCULUK SAN.VE TİC. A.Ş. COMPLIANCE UNIT

Name/Legal signature

place and date

we hereby confirm having given the correct information and we accept being registered in AMR's database .

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## CUSTOMER COMPLIANCE AGREEMENT FORM

( CUSTOMER COMPLIANCE AGREEMENT FORM )

( Customer Due Diligence Agreement)

Name / Company Name :

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Address : 

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City : 

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 Postal code : 

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Physical location (if different from postal address) :

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Company type:

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Passport Number / Company tax number: 

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Ahlatcı Kuyumculuk San.ve Tic.A.Ş. *Due diligence by establishing a set of ethical rules regarding customer relations in order to maintain its sectoral success, international accreditations and commercial reputation . Diligence ) has implemented procedures.*

Ahlatcı Kuyumculuk San.ve Tic.A.Ş. *It accepts the principle that precious metals come from legitimate and ethical sources, do not constitute any criminal element, and are not associated with armed conflict or*



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*human rights violations, in the activities in which it participates, cooperates and develops in relation to the supply of precious metals in the sense of gold refining .*

*Ahlatcı Kuyumculuk San.ve Tic.A.Ş. does business only with legitimate and law-abiding customers.*

*Ahlatcı Kuyumculuk San.ve Tic.A.Ş. evaluates that precious metals imported to Turkey by its customers are in no way associated with a government, political party, military institutions, criminal networks, illegal armed groups or private security forces. Both during the operation of the mine and during the transportation phase, the shipping company and the owner of the mine accept that the precious metal has never been involved in activities within the scope of labor force, misuse of child labor, war crimes, crimes against humanity and genocide against cruelty, torture, etc.*

*Customer Compliance Survey ( Due Diligence ) form and you will be asked to verify and provide all necessary information/documents on the matters stated above. When necessary , Ahlatcı Kuyumculuk San.ve Tic.A.Ş. You may also be subject to such control.*

Ahlatcı Kuyumculuk San.ve Tic.A.Ş. Compliance procedures, Gold Supply Chain Responsibility Policy and Due Diligence Do you declare that you are in compliance with the Diligence ) transactions? (Check as appropriate.)

\_\_\_\_\_ Yes, Ahlatcı Kuyumculuk San.ve Tic.A.Ş.We are compatible with

\_\_\_\_\_ No, Ahlatcı Kuyumculuk San.ve Tic.A.Ş.We are not compatible with

\_\_\_\_\_ Yes, Ahlatcı Kuyumculuk San.ve Tic.A.Ş.We are free from the points mentioned by.

Reason for exemption: \_\_\_\_\_

## EXPLANATION

*Company's Gold Supply Chain Responsibility Policy, Compliance rules and Customer Recognition System and Due Diligence We declare that we have read and understood the Diligence ) procedures .*

*Ahlatcı Kuyumculuk San.ve Tic.A.Ş. We declare that there is no violation of the policy and rules.*

*We undertake to provide additional documents and documents requested by authorized persons regarding this disclosure and compliance.*

Customer representative name: Company representative name:

Signature:

Signature:

Date:

Date:

Annex-C continuation

**CUSTOMER COMPLIANCE AGREEMENT FORM**  
( Customers Due Diligence Aggrement )Name / Company Name :  
\_\_\_\_\_Address : \_\_\_\_\_  
\_\_\_\_\_

Country : \_\_\_\_\_ Zip Code : \_\_\_\_\_

Physical location ( if different from mailing address ) : \_\_\_\_\_  
\_\_\_\_\_

Industry : \_\_\_\_\_

Company Tax ID / Passport Number : \_\_\_\_\_  
\_\_\_\_\_

*Of order to preserve the viability and reputation of Gold Refining Company AMR established ethical principles and Due Diligence policy about customer relations \_*

*Ahlatcı Kuyumculuk San.ve Tic.A.Ş. participates in, cooperates with, and enhances overall efforts to ensure that precious metals come from legitimate, ethical sources, and that they have not been associated with crime, armed conflict or human rights abuse. It is our policy to do business only with legitimate, law-abiding customers, and to deny our products and services to all others.*

*Please read the following statement carefully to confirm the signature at the bottom of the page :*

*the mine from where the gold is being exported to Turkey or its territories is free of identification of any affiliation of the company with the government \_ \_ parties , military , criminal network or non state armed groups , including in particular any reported instances of affiliation with non-state armed groups and / or public or private security forces . Also , the shipper whose name is on the shipping documents , or in many cases the owner of the mine, confirms that the gold that is coming in from a mine where any serious abuses ( torture , cruel , inhuman and degrading treatment , forced or weaselly*

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AHLATCI KUYUMCULUK SAN.VE TİC. A.Ş. COMPLIANCE UNIT

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*labor , the worst forms of children labor , gross human rights violations , war crimes , or other serious violations of international humanitarian law crimes \_ against humanity or genocide ) are not committed by any party in the mines , on transportation routes nor at the points where gold is traded and / or processed .*

*you will be required to validate , and provide all the information mention above in the due diligence questionnaire , whether the said party is the main source of gold or the subcontractor . you will remain responsible and accountable for certification and external audit of supplied precious metals to company .*

**are you in compliance with the Company compliance regulations , its Company Gold Supply chain responsiveness Company policy , and Due Diligence procedures or are you exempt ? ( Please mark the correct answer below with an “x”) :**

\_\_\_\_\_ Yes , we are in compliance with the Company as it concerns our industry .

\_\_\_\_\_ No, we are not in compliance with the Company as it concerns our industry .

\_\_\_\_\_ Yes , we are exempt from the Company as it concerns our industry .

reason for exemption : \_\_\_\_\_

—

**DECLARATION**

*we hereby confirm that we have read and understand the AMR Gold Supply chain responsiveness policy and its compliance regulation , Know your customers and Due Diligence Procedures .*

*we hereby declare that the particulars given herein are true , correct and complete to the best of our knowledge and belief , the documents submitted along with this application are genuine and we are not making this application for the purpose of contravention of any AMR Policies , Rules and regulations .*

*we hereby agree to provide any additional information / documentation that may be required by the Authorized parties , in connection with this compliance and declaration .*

Name of Company Representative : Name of Company Representative :

Signature :

Signature :

Date :

Date :

ANNE

X-D

CUSTOMER DECLARATION FORM:

gold :

Weight :

Source : Investment / saving Yes No

Heritage

Yes No

History

Signature

Name and surname