

Sustainability Report 2019



NADİR METAL RAFİNERİ

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Sustainability
Report
2019

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“Wisdom and intention are good partners, Form friendship among them, not discord, You will be comfortable in life,,

Nadir Tütüncü

1936 - 2017

We remember with love, respect and mercy.

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Despite all difficulties, we continue our journey firmly and confidently.

Introduction

Dear Stakeholders,

Struggle against coronavirus, which emerged at the end of 2019 and is the world's biggest problem, continues in full flood today. After the World Health Organization declared a pandemic in March, billions of people locked themselves in their houses and millions of businesses had to stop their businesses. While people were threatened by the coronavirus, economic concerns began to increase. And the world economy faced with the expectation of a serious recession.

In this difficult period of time, we successfully managed the environment of common sense and trust, and we continued on our way together

with our employees and stakeholders without any problems. This pandemic we live in, even if we don't want, has been a great experience for the whole world. Our 2019 Sustainability Report, which we prepared in such a period, demonstrated once again that how important sustainability is and that we can continue firmly despite all difficulties.

Health comes first. As always, our priority is the health of our employees and stakeholders. We continue our way confidently by keeping all the necessary security measures at the highest level to provide uninterrupted service.

Chairman
Abdullah Tütüncü

Sustainability Report 2019

As a global player of the Turkish precious metals sector Nadir Metal Rafineri, as well as being a reliable business partner for its stakeholders since its establishment, continues its guiding role also with its responsibilities. Nadir Metal Rafineri aims to present the most up-to-date information about its activities to its stakeholders by the sustainability reports published as a requirement of this responsibility.

2019 Sustainability Report includes information about the activities carried out between January 1 - December 31, 2019, and reflects the operations and performance results. Being the fourth report, Nadir Metal Rafineri aims to explain its activities, social and environmental performance comprehensively and transparently.

Nadir Metal Rafineri develops new strategies along with the goal of stable growth and pursues sustainable development and conservation of natural resources as priority activities. All of the solutions we offer as a company that specializes, ensures continuity and adds (+) value with its differences, the solutions we offer all in order to maximize the profit and pleasure of our stakeholders.

Our 2019 Sustainability Report, which we have prepared in line with our principles of transparency, responsibility and accountability, has been printed in limited number in order to minimize environmental impacts. You can find the PDF version and previous reports at www.nadirmetal.com.tr.

All of the solutions we offer as a company that specializes, ensures continuity and adds (+) value with its differences, the solutions we offer all in order to maximize the profit and pleasure of our stakeholders.

Our Vision

Providing the fastest and most modern service for the Turkish jewelry and mining sector and to be one of the top 10 leading refineries in the international area with besides its local leadership in Turkey.

Our Mission

Becoming one of the national and international leading refineries

- Protecting our values,
- Growing continuously with new technologies,
- Increasing our production capacity acceleratingly,
- Reducing our environmental impacts within the scope of sustainability.

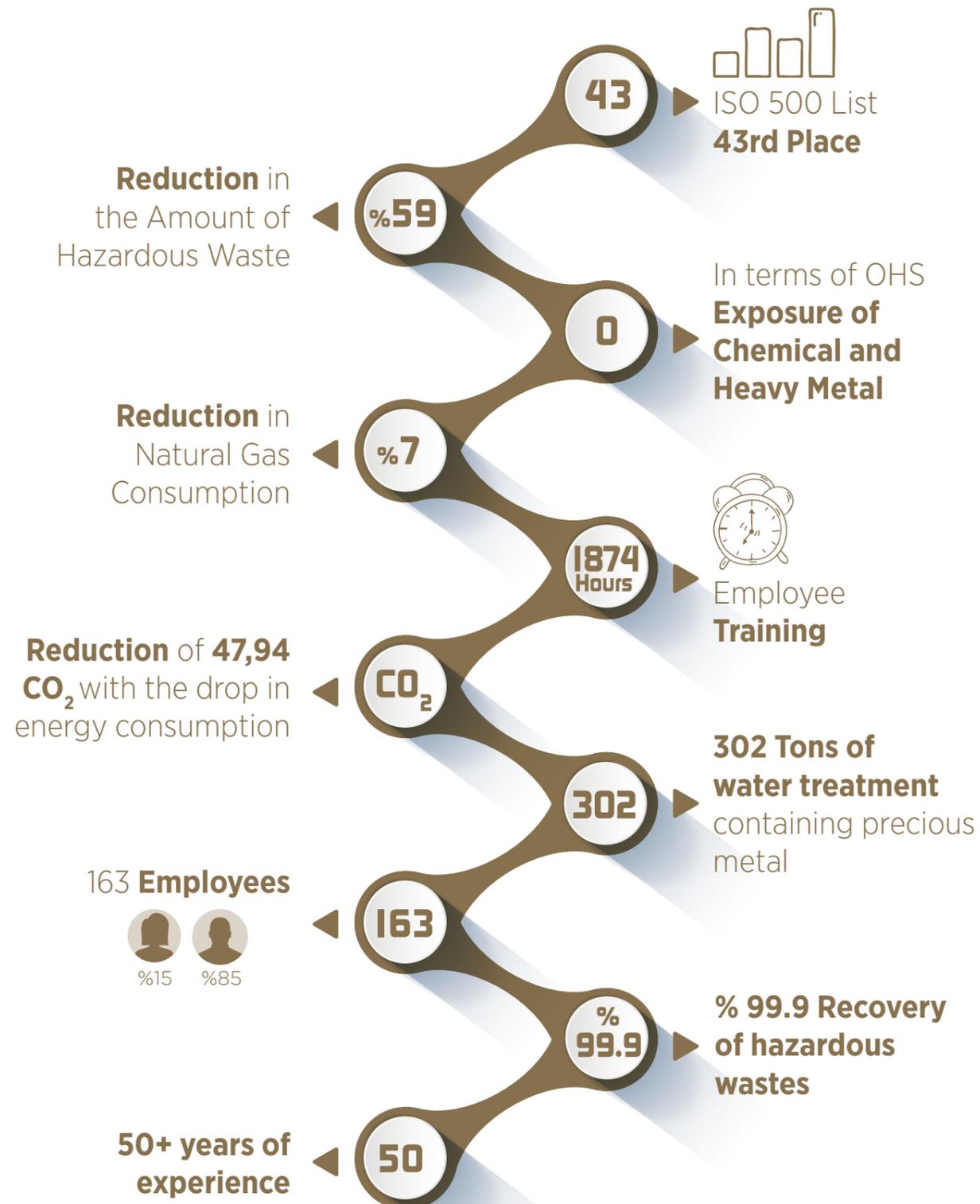
Providing services of precious metals refining and recycling.

79 Au Gold 196,97	47 Ag Silver 107,87	45 Rh Rhodium 102,91	78 Pt Platinum 195,08	46 Pd Palladium 106,42
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We, as the first and only accredited refinery in Turkey for both gold and silver at the LBMA - London Bullion Market Association, SBMA - Singapour Bullion Market Association and BIST - Borsa Istanbul, have been producing gold, silver, platinum and palladium by **performing precious metal refining in most eligible and high-quality standards.**



Nadir with Numbers



Nadir Subsidiaries

NMGlobal KIYMETLİ MADENLER TİCARETİ A.Ş.

which started its operations in 2019, provides trust and quality-oriented services to corporate customers. NMGlobal Precious Metals, as a member of Borsa İstanbul, maintains its activities as a stock exchange brokerage house in the Precious Metals Market.

NADIR GOLD ITALY

The activities in the European region gained speed along with the London Bullion Market Association's (LBMA) accreditation of the Nadir Metal Rafineri for gold in 2011 and for silver in 2012, Nadir Gold Italy was established at the end of the same year.

Nadir Group Companies

4R ÇEVRE & ENERJİ

4R Çevre ve Enerji San. ve Tic. A.Ş., founded in 2015 to provide services for integrated waste management, maintains its activities in the district of Kapaklı, Tekirdağ; services that 4R Çevre ve Enerji provides to its customers are Refuse-Derived Fuel Preparation, Interim Storage, Packaging Waste and Non-Hazardous Waste Collection and Separation Plants.

NMR Hediyeelik Eşya

NMR Hediyeelik Eşya Tic. ve San. Ltd. Sti. has started its operations in 2013 and is selling "Nadir" branded gram bars of gold and silver products through its online website. It has become a reliable source for online gold purchasing Internet users.

NADIR DÖVİZ Nadir Döviz ve Kıymetli Maden Ticareti Yetkili Müessesesi A.Ş.

It is the first ISO 9001 certified exchange offices in Turkey which started its operations in 1997 and it is the 076 numbered member of Borsa İstanbul. Nadir Döviz continuously increasing its trading volume in Borsa İstanbul takes part in among the top five in gold and silver considering the last five years. It is the wholesaler and distributor of Nadir Metal's products in Turkey.

About

Nadir Metal Rafineri

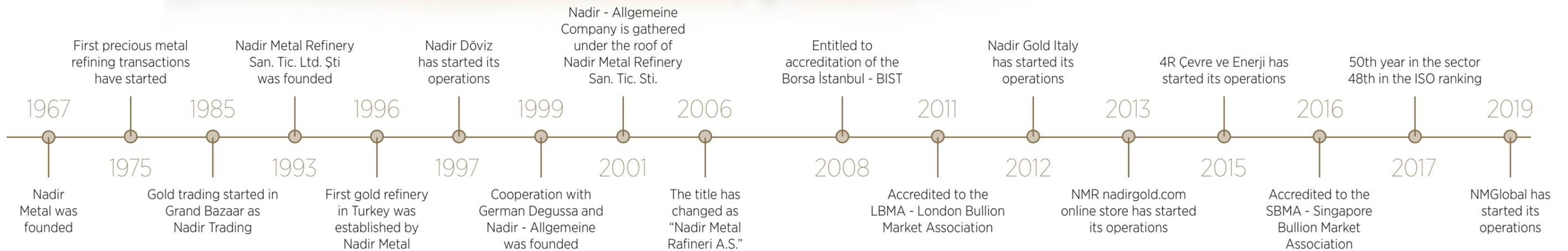
Nadir Metal that has started its activities in 1967 by Nadir Tütüncü, has been operating more than 50 years in the field of precious metals. Nadir Metal Refinery that creates value-added works has become a global player in a dynamic and constantly developing world market with its goal of achieving perfection and exactitude.

What makes gold precious is

Nadir

Nadir Metal Refinery with its average annual capacity of 125 tons of gold, 250 tons of silver and many other precious metals, has been accredited at Borsa Istanbul in January 2008, London Bullion Market Association in gold in December 2011, in silver in June 2012 as “Good Delivery Refiners” and Singapur Bullion Market Association in 2016.

In addition to refining, sweep and waste recovery and laboratory services, we are producing and trading of precious metals (gold, silver, platinum, palladium, rhodium, etc). We also produce Nadir Metal and NadirGold branded gold, silver and platinum products and private collection products.



Our Products

At the international standards, state-of-the-art high-end security;



Encryption technique is applied on the product surface which is only visible with microscope



Encrypted text applied on any part of the product that is only visible with microscope

Product safety is as important as product quality. Certified gram bar and coin products can be packaged with hologram and laser printing techniques and quality, purity are guaranteed by different safety points. At **international standards**, gram bar and coin products which are within credit card size certifications can be produced by many safety criteria such hologram and encryption techniques applied on the surface, matching serial numbers, label hologram, UV printing technique.

“Special safety points on the product surface and special PVC feature of certificate that cannot be opened without deforming it, has enabled us to prevent counterfeiting and the construction of imitation products.”

Nadir Metal Rafineri, that produces products at international standards, controls the product safety at every stage; in all processes from production stage, up to the last chain point. The slightest negativity, which creates suspicion in the quality of the product, lets the process to start from the beginning and this continues until the perfect result is achieved. Therefore products of the Nadir Metal are always preferred in confidence.



Rainbow hologram technique applied on logo

It is impossible to reach to the gold within the certificate without shattering and harming the PVC cover because of the high quality and special feature of the PVC.

Matching of Serial and Bar numbers.

Back face 2d encryption technique Variable product weight and logo when moved.

Operation Map

Along with its certifications and international accreditations addressing the entire global market, Nadir Metal Refinery has become a sought-after brand in precious metals and continues to operate its services in many countries.

Nadir Metal Refinery provides the best service in approximate 30 countries in the world and in the European region with Nadir Gold Italy that is founded in Italy.



Bullion Banking

Scrap gold collection at bank branches

The accounts opened by investors in order to make use of their existing gold savings or to save gold are called Gold Deposit Accounts.

We can evaluate the Gold Deposit Accounts under two headings. The first one is the 'under the pillow' gold; bracelets, necklaces or other jewelery and Turkish Mint products etc., of household is valued by experts and the pure gold value is booked at bank accounts. The other is in the form of Gold Deposit savings accounts where investors can invest in gold against currencies such as Turkish Lira, Dollar, Euro or any other foreign currency, for savings and investment purposes, even if they do not have physical gold beforehand. All these activities take place under the name of Bullion Banking in Turkey.



Our professional and experienced experts in their fields evaluate households' gold in jewelry, coins and various forms at bank branches, and in return, their specific amount is deposited into the gold deposit account of the relevant bank, and the refined gold is physically delivered to the relevant banks as bullion.

Scrap gold collections has increased about 50% in 2019 to 1.5 ton over 1 ton in 2018.

Bullion Banking, which started with 2 banks in 2013, continuous as domestic households gold collection activities with 4 banks in 2019.

In the 6 year time, more than 6 tons of domestic household gold has been gained to the economy through golden days at bank branches all over the cities of Turkey.

Services have been provided with 15 professionals and trained experts in the field.

Household gold collection activities are carried out in 9 different bank branches per day.

In order to be more efficient every year compared to the previous year, our company's environmental and sustainable goals are also taken into consideration while planning our activities.

As a result of innovative and solution-oriented activities , more than 5,000 transactions have been carried out at bank branches in 2019, along with unconditional customer satisfaction.



Production

Nadir Metal Rafineri produces refined precious metals from primary and secondary raw material sources and noble metal recovery, refined products from its authorized waste groups by using modern technologies. In addition to refining and recovery processes, different noble metal salts and coating solutions are produced as well.

Nadir Metal Rafineri carries out its production activities by merging and internalizing the principles of creating add value for its country, social responsibility, protection of the environment, and complying with occupational safety rules without any compromises.

The production processes are designed to produce metals with a (a'nın silinmesi) purity of at least 99% by refining gold alloys, silver alloys and noble metal alloys with high and low silver content. Refining processes are carried out as a combination of hydro metallurgy, pyrometallurgy and electrometallurgy operations in order to create a minimum environmental load. The choice of method in the processing of different materials is determined not with a focus on profitability, but with the principle of creating the least environmental burden.

In recovery of waste and secondary raw materials, starting materials are poorer and more complex in composition than metal scraps (anode sludge from copper and silver electrolysis, rich foam, active carbon from primer gold production, sweeps, slag waste, electronic scrap, refinery and automobile catalysts, batteries, photographic films, implant materials, aviation scraps, plating baths, washing water, etc.). Recycling materials often contain platinum group elements as well as gold and silver. In 2019, the processing volume from wastes and secondary raw materials (hazardous and non-hazardous waste) increased by 9%.

In process determination, technologies that will minimize the amount of waste water, carbon footprint and waste gas while maximizing profitability on behalf of our country and the company are determined and implemented through continuous R&D studies. For this reason, recovery processes, especially from complex waste groups, consist of dynamic production processes and the best available technology (BAT) is preferred as the application procedure.

Process distribution of production in 2019



Nadir Metal Rafineri,

offers a wide range of products and services to its customers.

Au 196,97 GOLD	Ag 107,87 SILVER	Pt 195,08 PLATINUM	Pd 106,42 PALLADIUM	SPECIAL PRODUCTS	PLATING PRODUCTS
Large Bar	Large Bar	Gram Bar	Gram Bar	Gold and Silver Coins Collection Products IZEV Collection Gold Series Customized Products	Rhodium Initials
Kilo Bar	15 kg				Rhodium Supplements
Gram Bar	5 kg				Potassium Gold Cyanide
Coins	100 oz				
	10 oz				
	Kilo Bar				
	Gram Bar				
	Coins				
	Grains				



Production - Rhodium

Being Turkey's first and only manufacturer in Rhodium-plated items Nadir Metal Refinery is contributing to the country's economy by reducing imports of Rhodium.

Rhodium plating products constitute the last step of white gold and silver jewelry production process and have become very important in recent years. Rhodium increases the allure of the products and provides corrosion resistance. Nadir Metal is the first company that produces Rhodium plating products at its Istanbul plant, since 2013 in Turkey.

Products are presented to the domestic and international markets with the brand "Nadir Rhodium". Metallic rhodium with high purity of 99.98% is being used to produce plating solutions. These solutions have gained the appreciation of the jewelry sector with characteristics of such as whiteness, brightness and excellent dispensing power on metal surface, extensive sales and distribution network.

Environmental Responsibility

Nadir Metal Refinery is aware of the environmental impacts of its industrial activities. In order to minimize the burden, we carry the additional costs of working with lower emissions than the limit values stipulated in the laws and norms. We see it as an investment to our future.

Our energy management system enables us to reduce our carbon and other emissions on a regular basis by dynamically making the correct and efficient use of resources with lower energy consumption process equipment and production processes.

For Nadir Metal Rafineri, the value of water is priority, and minimum water consumption is a must in both process selection and technological applications.

We spend a significant part of our investment and operating expenses not in creating products, but in reducing, recycling the wastes generated during the processes of obtaining the products, making it harmless to the environment. By internalizing this approach and following an environmental policy based on ethical foundations, we desire to set an example for our colleagues in the same lane, both for the environment and for the future of the environment. We commit to increase environmental protection measures at all of our activities by using continuously measurable environmental technologies of the day and to reduce our carbon and water footprint by implementing our environmental strategy without compromising our basic principles.



Enviromental Responsibility

Air

In accordance with the Environmental Law no: 2872 gazetted on 03.07.2009 and numbered 27277, "Industrial Air Pollution Control Regulation" (Rev.20.12.2014, number 29211) aims to protect the environment and human health. Nadir Metal Refinery, in line with the regulations, made all the necessary investments in technology in order to reduce the emissions and is carrying out chimney measurements that are reported to the Ministry of Environment and Urbanization periodically.

Soil

In accordance with the Environmental Law no: 2872 published in the Official Gazette dated 08.06.2010 and numbered 27605 "Control of Soil Contamination Regulation" regulates technical and executive procedures and principles concerning the prevention of soil contamination, detection of the fields and sectors that are likely to be contaminated and cleaning of the contaminated area.

Nadir Metal Rafineri complies with the regulation, and samples were taken by the Ministry of Environment and Urbanization in terms of quality of soil and groundwater.

The Site Sampling Analysis Plan, the Field Condition and Risk Assessment Final Report have been submitted to the commission formed by the Provincial Directorate of the Ministry of Environment and Urbanization and the site has been declared as No Monitoring Site. We commit the continuation of sustainability in this regard.

Water

Nadir Metal Refinery fullfill it's obligations for the treatment of industrial wastewater generated by its production activities. Istanbul Water and Sewerage Administration has entitled Nadir Metal Refinery with a "Discharge Permit License" as the specifications of the water to be discharged met the requirements and discharge procedure. In 2017, Ministry of Environment and Urbanization has entitled Nadir Metal Refinery with Environmental Permit and License Certificate for the recovery of hazardous and non-hazardous wastes. Nadir Metal Refinery accepts wastewaters containing precious metals and provides recovery process.

In 2019, Nadir Metal Refinery treated 302 tons of wastewater obtained from jewelery and recycling companies and ensured the recovery of precious metals . Compared to Year 2018, an increase of 63%.

Waste Management

Nadir Metal Refineri follows “Zero Waste” principle at waste management.



Waste Management

We, Nadir Metal Rafineri have eliminated 80600 m3 carbon dioxide that is a greenhouse gas from the air, produced 80600 m3 oxygen gas, protected 111 adult trees that provide the oxygen need for 220 persons, provided savings of 208 m3 of water and 11375 liters of oil by sending 6500 kg of collected paper-cardboard and packaging wastes from its factory and branches to the licensed recycling factory named "4R Çevre ve Enerji San. ve Tic.A.S in 2019. If technically possible packaging wastes such as plastic and cardboard are evaluated in our internal processes, if not they are stored at our temporary waste storage area for waste management, to be sent to licensed companies authorized by the Ministry of Environment and Urbanization to be classified in a controlled manner without harming the environment.

The recovery of waste machine oils generated during maintenance activities, contaminated cloths, protective clothing etc., metal pieces coming from sampling and samples is carried out in-house. Our wastes that fall into the category of hazardous waste such as waste oils generated during generator and forklift maintenance, contaminated packaging wastes, metal parts, fluorescent lamps are disposed of by the licensed companies we work with on a contractual basis.

Nadir Metal Refinery, annual waste from the factory location;

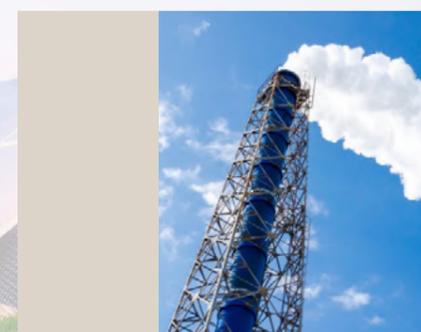
Type of Waste	2018 (kg/year)	2019 (kg/year)	Disposal Method
Hazardous Waste			
Fluorescent Lamps	26	13	Storage
Waste Batteries	1	1	Storage
Vegetable Waste	150	150	Reuse
Oil Contaminated	1.621	561	Recycle
Packaging	408.440	257.208	Recycle
Waste Sludge	200	-	Recovery
Waste Oils Spray Cans	143	15	Recycle
Maintenance Waste Oils	5	5	Recovery in the facility
Contaminated clothing, protective clothing etc.	1.020	720	Recovery in the facility

Type of Waste	2018 (kg/year)	2019 (kg/year)	Disposal Method
Non-Hazardous Waste			
Paper, Cardboard, Plastic	2.160	3.529	Recovery
Glass	500	500	Recovery
Refinery Slags	43.177	-	Recovery
Solid Waste	30.357	30.276	Disposal
Metals	3.820	20.760	Recovery
Powders and Parts Containing Precious Metals	4.287	5.289	Recovery in The Facility
Non-Ferrous Metals	10.680	-	Recovery

Energy Management

Natural Resource Type	2017	2018	2019
Direct Energy Consumption (Kwh)	3.998.340	3.592.759	3.355.629
Indirect Energy Consumption Kwh)	3.303.910	3.419.321	3.420.737

Acting in line with our energy management objectives, we have seen that we have improved the results of our R&D studies in pyrometallurgical process which is one of the precious metal recovery processes in our evaluations at the end of 2019.



In 2018 ;

It was seen that the use of natural gas has decreased by %10, and the carbon dioxide which is greenhouse gas has decreased by 81.99 tons of CO2e.

In 2019 ;

It was seen that the use of natural gas has decreased by % 7, and the carbon dioxide which is greenhouse gas has decreased by 47.94 tons of CO2e.

Carbon Footprint

We commit the continuity of voluntarily calculation of our carbon footprint as being the first company in our sector since 2016 in Turkey.

Nadir Metal Rafineri is evaluating its impacts on climate change by calculating its carbon footprint at corporate level every year, complying with ISO 14064-1 standards and with a Greenhouse Gas Management plan.

Year 2019 Compared To Year 2018;

Carbon footprint in **Esenyurt Factory** was calculated as 3099.71 t CO₂e, 362.23 t CO₂e or 10% reduction was observed.

Branch-1 Carbon footprint is calculated as 28.2 tCO₂e in total, decreasing by 25.75 tCO₂e compared to the previous year, there was a 48% reduction.

Branch-2 Carbon footprint was calculated as 114.84 tCO₂e, and there was an increase of 1.19 tCO₂e. This increase is due to the increase in gram bar production in the same periods, machinery investments and the increase in the volume of electricity used. Since “energy saving” is one of the main criteria in our machine selection, this increase is limited to 1%.

2018	FACTORY CARBON FOOTPRINT t CO ₂ e	BRANCH - 1 CARBON FOOTPRINT t CO ₂ e	BRANCH - 2 CARBON FOOTPRINT t CO ₂ e	TOTAL
Scope 1	1165,41	29,88	0,00	1195,29
Scope 2	2222,30	13,57	113,65	2349,52
Scope 3	74,23	10,50	0,00	84,73
Scope 1 + 2 + 3	3461,94	53,95	113,65	3629,54

2019	FACTORY CARBON FOOTPRINT t CO ₂ e	BRANCH - 1 CARBON FOOTPRINT t CO ₂ e	BRANCH - 2 CARBON FOOTPRINT t CO ₂ e	TOTAL
Scope 1	791,75	0,00	0,00	791,75
Scope 2	2232,22	14,16	114,84	2361,22
Scope 3	75,74	14,04	0,00	89,78
Scope 1 + 2 + 3	3099,71	28,2	114,84	3242,75

In order to reduce our carbon footprint, we prefer recyclable packaging and shipping materials, products made of smaller and biodegradable materials, especially the use of electricity produced from alternative energy sources, regardless of cost factors. We continue R&D studies to pay attention to the use of natural gas in pyrometallurgy processes which is one of the refining processes.

For reducing the carbon footprint at Nadir Metal Refinery;

- Equipment and installations with low energy consumption are used in all our production lines and lighting.
- Lighting installations that do not have to be constantly lit are automatic.
- Priority is given to the closest sources in the supply chain.
- Packaging materials are never used more than necessary.
- Our packaging materials are biodegradable.
- It is preferred that the purchased materials / chemicals are concentrated.
- Staff are encouraged to use shuttle vans.

National / International Compliance

The subjects within the scope of “Compliance” are an indispensable element of the sustainability of the company and its activities for Nadir Metal Rafineri. Nadir Metal Refinery is aware of the risks associated within its supply chain and business operations and carries on its business manner as fully compatible national/international standard, guidelines and directives and all updates are also reflected in its activities.

In order to ensure the continuity of its responsible supply chain, Nadir Metal Refinery is aware of its responsibilities about non-participation in money laundering, non-contribution to the financing of conflicts and terrorism, non-employment of child labor and non-infringement of human rights, including to comply with the occupational health & safety principles at any point in its precious metal supply chain.

- Financial Crimes Investigation Board’s Regulations
- Borsa Istanbul Responsible Gold Supply Chain Guidance
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Supplement on Gold
- LBMA Global Precious Metals Code
- LBMA Responsible Gold Guidance
- LBMA Responsible Silver Guidance
- World Gold Council Conflict Free Gold Standard

Nadir Metal Rafineri operates in accordance with the local legislation and regulations of the countries and national and international standard requirements. In this context, Nadir metal Rafineri commits not to engage in any direct or indirect business with any sanctioned countries / regions / entities / persons imposed by the resolutions of the Security Council of the United Nations, European Union, Treasury of the United Kingdom, United States of America and any other related sanctions, countries that are subject to call for action published by the FATF and furthermore to any others that precious metals market is subject to. Responsible Gold and Silver Supply processes are followed by applying them in place and rightly in order to identify and minimize the risks that have occurred or could occur. In addition, Nadir Metal Rafineri believed that its suppliers / customers as an important part of this chain and encourages its stakeholders in the whole chain to be a part of this development while enhancing its own sustainability practices.

Membership and Accreditations

Nadir Metal Refinery is audited annually on its supply chain and ‘Responsible Gold & Responsible Silver’ practices according to its accreditations at national and international institutions. Our **compliance and independent audit** reports are published on our web site

LBMA
London
Bullion Market
Association

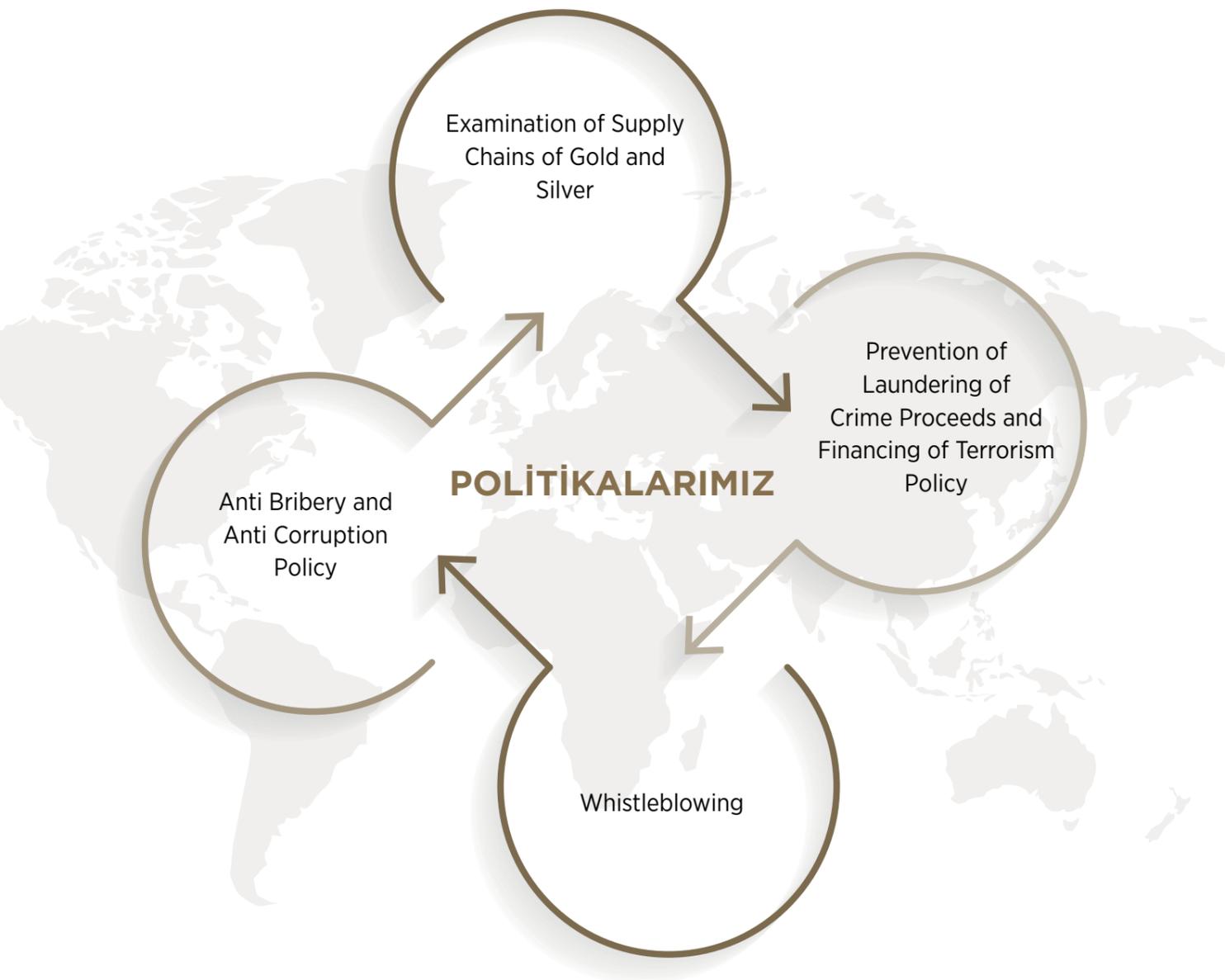
SBMA
Singapore
Bullion Market
Association

BIST
Istanbul Stock
Exchange

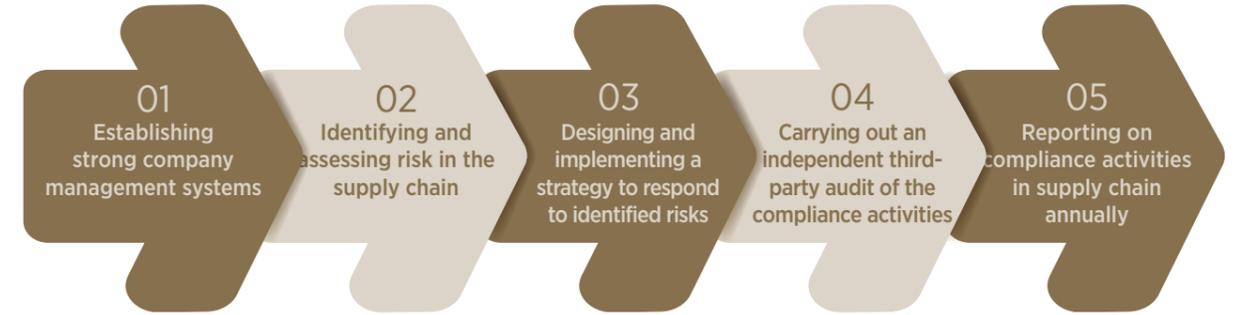


Company Policies

- Examination of Supply Chains of Gold and Silver
- Prevention of Laundering of Crime Proceeds and Financing of Terrorism Policy
- Anti Bribery and Anti Corruption Policy
- Whistleblowing Policy



There are 5 basic steps to ensure compliance with Responsible Gold and Silver:



Supply chain management and changes or updates within the scope of compliance are carried out with the participation of relevant departments in the company and all of the employees and are supported by internal company training if necessary. Identification or early detection of the risks that may endanger the existence, development and continuation of our company or supply chains, assessment of those risks, implementation of necessary measures and parameters for the management of those risks are detailed within our Company Policy and Risk Assessment Guidance. Risk assessment of any strong possibility or existence of the fact that has been mentioned as high risk according to 'Criteria About High-Risk Gold /Silver Supply Chains', is conducted by our Compliance Officer and/or Risk Committee under the Board of Directors. In certain cases, the authority to establish or maintain the business relationship is with the Risk Committee.

A consistent business relationship based on transparency, honesty and accountability is the basis of Nadir Metal Refinery's relationship with all its internal and external stakeholders. We support to increase the awareness of compliance to ensure the integrity, compatibility and sustainability of our supply chains. In this scope, we share information about the relevant legal regulations and our company policies to adopt a common understanding.

▶ Within in scope inward processing regime with Communiqué regarding Communiqué No. 32 on the Protection of the Value of Turkish Currency dated on 03.03.2020, it has decided import of standard unprocessed precious metals will be made only by the precious metal intermediary institutions that are members of the Precious Metals Exchange

▶ Within the scope of Inward Processing Regime with Decision No. 32 on the Protection of the Value of Turkish Currency dated on 03.03.2020,

1- Imports of Standard Unprocessed Precious Metals will be made only by the precious metal intermediary institutions that are members of Precious Metals and Diamond Market of Borsa Istanbul.

2- Imported Standard Unprocessed Precious Metals within the Inward Processing Regime has to be refined/produced by the refineries included in the Refinery List, published by Borsa Istanbul and bear the seal or name or emblem of the refinery.

IMMIB – Compliance Topics and Impact on the Jewellery Industry



Nadir Metal Refinery has participated to the seminar organized by the Istanbul Minerals and Metals Exporters Association with the headline ‘Changes in gold trade and what the companies need to do to prepare for this change’ on August 29, 2019.

We gave information about the National/international compliance rules and regulations and Compliance Practices in Gold Trade and their effects on the jeweler sector, importance of the ‘Know Your Customer Process’ and Nadir Metal’s practices in this contexts.

Borsa Istanbul Training in cooperation with OECD and LBMA

Nadir Metal Rafineri participated in the training of Borsa Istanbul that organized in cooperation with OECD and LBMA, and shared its experiences in compliance and due dilligence practices with local precious metal market participants.

Within the scope of FATF 4th tour evaluation, ensuring the participation of jewelers operating in the sector on Anti-money Laundering and Combating the Financing of Terrorism (AML/CFT) and becoming applicable control and audit mechanisms in order to increase the effectiveness of the measures to be taken in this situation have been included in the studies carried out by MASAK.

ASEAN Gems & Jewellery Association Conference – OECD



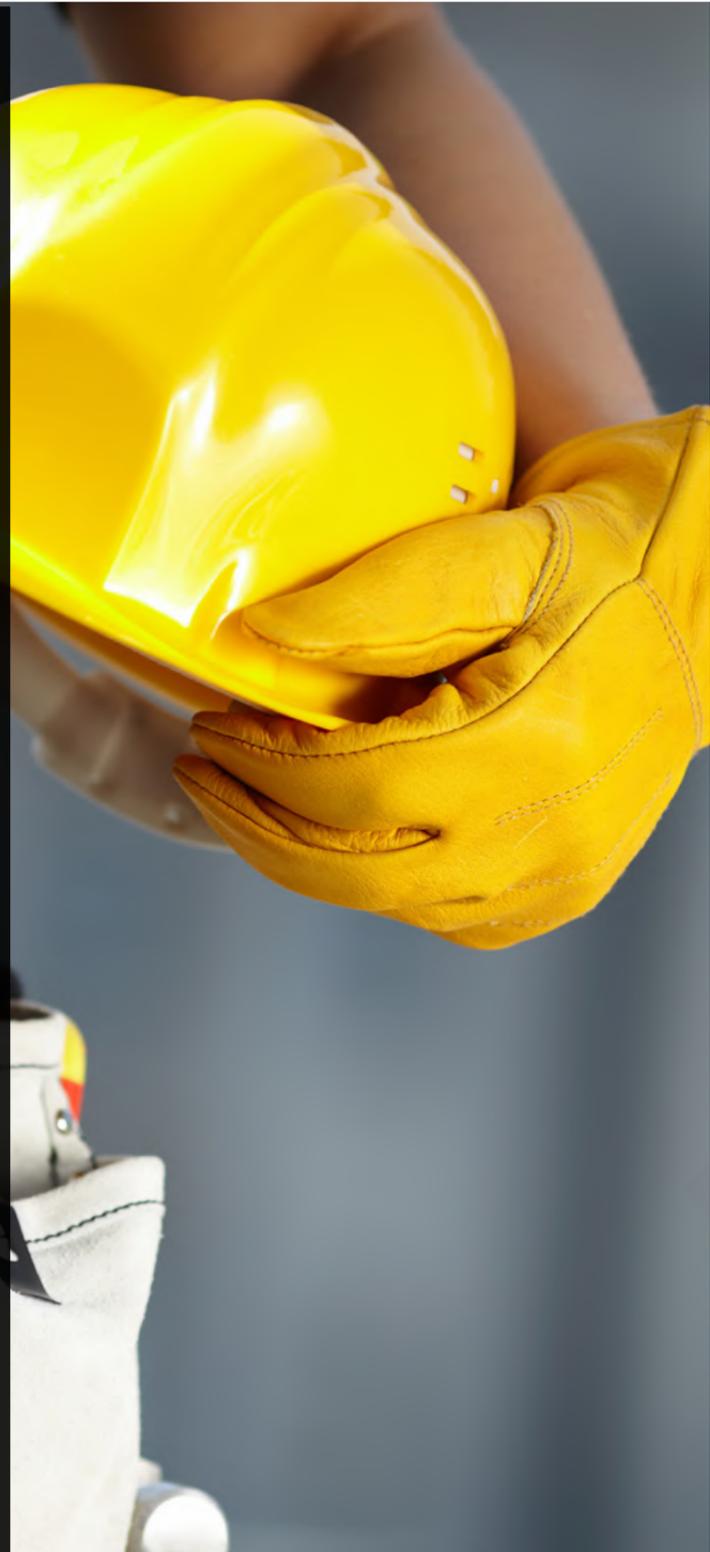
8th ASEAN Gems & Jewellery Association Conference, which took place on 8-12 October 2019 in İstanbul, was attended by ASEAN member countries and sectoral dialogue partners, where more than twenty countries, the most important exporters and the Presidents of the Jewelers Exporters’ Association were hosted in the organization. Nadir Metal Rafineri contributed to the conference by providing information on National and International Compliance topics and their effects on the jewelry industry together with the OECD Representative

Occupational Health And **Safety**

At Nadir Metal Rafineri, occupational health and safety issue is carried out within the framework of occupational health and safety policy. Nadir Metal follows the latest technology and practices and integrates them into business processes in order to continuously improve its performance in the field of occupational health and safety, which it manages in line with the goals of zero occupational accidents and zero occupational diseases. In order to guarantee continuous improvement, risk analyzes, awareness raising activities and audit activities are carried out in all activities. At Nadir Metal Rafineri, occupational health and safety practices are managed in line with the OHSAS 18001 standard in integration with Quality and Environmental Management Systems.

In Nadir Metal, which determines “zero occupational accident and zero occupational disease” as a target for all employees, with the awareness that achieving this goal can only be possible with team work, efforts are continuing for the participation of employees at all levels and to provide the necessary resources. Occupational health and safety trainings and drills are organized at regular intervals in order to provide a safe working environment for employees and to raise awareness about occupational health and safety.

At Nadir Metal, all efforts to increase awareness on OHS, decisions taken and operational responsibility regarding OHS management are represented at the senior management level. In line with Nadir Metal's OHS Work Program, OHS Board Meetings are held monthly.



OHSAS 18001 is applied in all units of Nadir Metal Refinery. There is an Occupational Health and Safety Board in order to reduce occupational health and safety risks and improve performance in our fields of activity, and there are 10 members, 2 of whom are employee representatives. Our OHSAS 18001 system; It is constantly supported by training, information, supervision and improvement activities; The structure of the OHS board, employee representative, OHS Specialist and Workplace Doctor appointments, internal inspections, risk analysis, fire drill, emergency action plan issues are managed in accordance with legal regulations. In this context, OHS targets and controls are monitored periodically and all kinds of issues, dangers and risks that may adversely affect occupational health and safety, and the measures taken and / or to be taken are evaluated as the agenda in OHS board meetings.

All activities carried out within the scope of Occupational Health and Safety at Nadir Metal Refinery are carried out with a web-based OHS Software whose license is renewed every year.

In addition to all the controls and improvements made in order to prevent work accidents, all employees are provided with personal protective equipment suitable for their work on debit forms against signature, and the use of PPE is also inspected.



Occupational Health And **Safety**

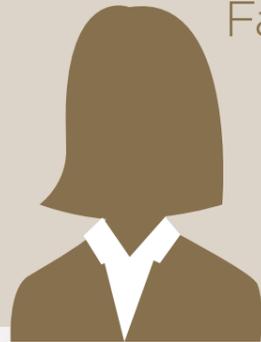
Recruitment examinations of Nadir Metal Refinery employees, Periodic examinations, Radiological analyzes, all health screenings, Toxicological analyzes, Physiological tests, Polyclinic examinations are performed continuously and periodically, also are recorded and controlled by the Workplace Doctor.

In 2019, Nadir Metal employees have been received 844 man-hour occupational health and safety training by the occupational safety specialist and workplace doctor.

Table of Education Status of Nadir Metal Employees

EDUCATION TYPE	NUMBER	%
High School	15	43
Associate Degree	5	14
License	13	37
Master's Degree	2	6

Factory Total Number of Employees



Female: 17

White collar: 12
Blue collar : 5

Male: 75

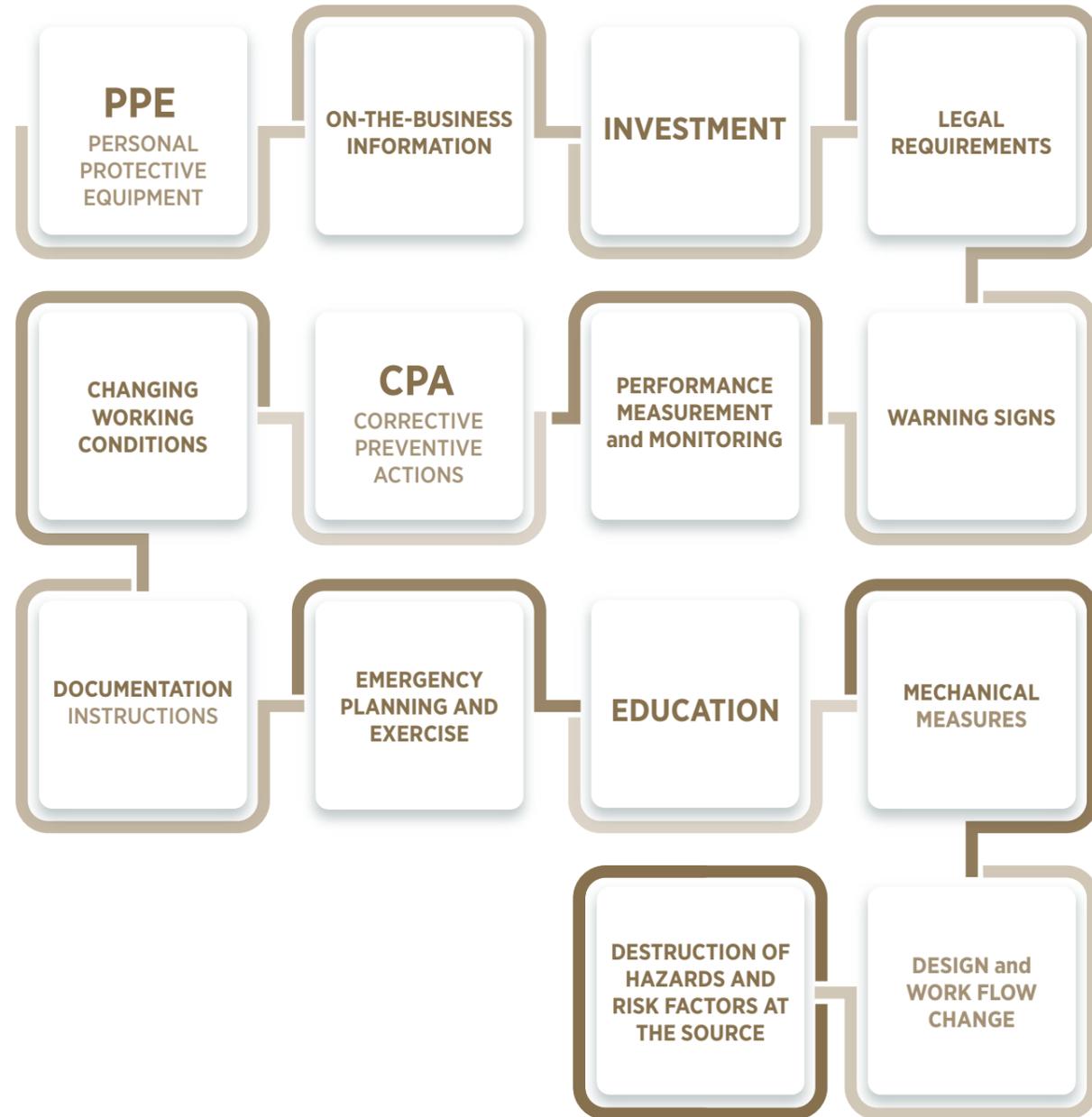
White collar: 9
Blue collar : 66



EDUCATION SUBJECT	TRAINING STAFF	CONTENT OF THE TRAINING
Occupational diseases and prevention principles (4 hours)x2	51 staff - 44 staff	Causes of Occupational Diseases, Disease Prevention Principles and Application of Prevention Techniques, Biological and Psychosocial Risk Factors, First Aid
Occupational Health and Safety Training	51 staff - 44 staff	Information on Labor Legislation, Occupational Health and Safety Law No. 6331, Legal Rights and Responsibilities of Employees, Legal Results Arising from Work Accidents and Occupational Diseases
Basic Occupational Health and Safety Training	51 staff - 44 staff	Occupational Health and Safety in the Processing of Precious Metals, Chemical, Physical and Ergonomic Risk Factors, Manual Lifting and Handling, Safe Use of Work Equipment-Safe Use of Machinery, Benches and Devices, Hand Tools / Hazards and Risks, Electrical-Electrical Hazards, Risks in Workplaces, Electrical Accidents and Prevention Measures, Safety and Health Signs, Use and Importance of Personal Protective Equipment
Fire training and fire extinguishing practice	Emergency Teams and other staff (88 people)	Precautions Against Flashing, Explosion, Fire and Fire -How Should Extinguishing and Rescue Be Done? Evacuation and Rescue / Emergencies in Workplaces

Occupational Health And **Safety**

Risk Control Methods Applied in Nadir Metal Refinery



With the Risk Assessment Report prepared for Nadir Metal and the periodic controls carried out in all production sites, it is aimed to prevent health hazards and risks that may arise from the environment where the employees are located and also to protect the employees against work accidents and occupational diseases. As of 2019, no occupational disease has been detected in employees.

The necessary health examinations of all employees are made and recorded at specified intervals.

% Distribution of identified hazards and risks according to departments

(According to Nadir Metal Refinery current risk assessment report)

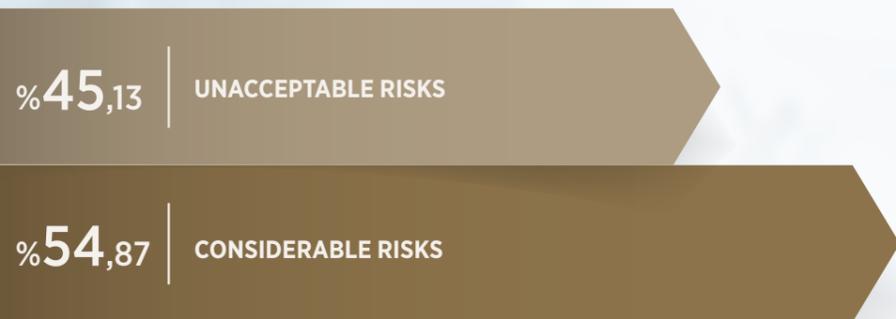


Occupational Health And **Safety**

Causes that may cause an accident depending on the risk assessment
(According to the Nadir Metal Rafineri current risk assessment report)



Risk rates in% by action type
(According to the Nadir Metal Rafineri current risk assessment report)



All environmental measurements (dust, gas, noise, thermal comfort, lighting, etc.), planned for 2019, have been made for the required production site and the working areas of the enterprise and according to the measurement reports, all revisions and regulations in required departments and working environments have been made suitable in accordance with the standards.

It is tried to prevent occupational accidents that may occur with the use of chemicals that are used extensively in the production departments of the factory. The awareness of all employees is increased with warning signs posted in relevant places in this regard.



Within the scope of "HEALTH AND SAFETY CONDITIONS REGULATION IN THE USE OF WORK EQUIPMENTS" published by the ÇSGB in the Official Gazette dated 25.04.2013 and numbered 28628, the maintenance and controls of all tools and equipment used within the company are carried out as specified within the scope of OHSAS 18001 OHS Management System and all the mentioned equipment is operated and used with compliance reports.

With the practical fire and building evacuation drills given to 88 personnel as planned in 2019, it is aimed to be prepared for emergencies that may occur, to review emergency measures, to ensure that the personnel learn the emergency action styles and to improve the ability of emergency teams to respond to the incident.

Despite all the controls and improvements made, in 2019, there was an injury-related occupational accident as a result of the employee's personal error, and 89-day workforce was lost as a result of the accident. In order to prevent the recurrence of this work accident, the relevant personnel were trained and the negative conditions were eliminated.

The Occupational Health and Safety Board prepared a report to evaluate all the work carried out within the scope of OHS at the end of 2019 and to determine the issues to be included in the next year's work program with the information and data obtained and submitted it to the senior management.

Nadir Metal Refinery has two well-equipped and licensed laboratories used by its expert staff.

Nadir Metal Refinery Laboratory, with our expert staff, adopts to carry out the sensitive and accurate analysis objectively based upon confidentiality principle by performing the requirements of the international standards and management systems in the business process

Nadir Metal Refinery Laboratory work in a high quality and objective way based upon scientific foundations by constant improvements within the frame of ISO/IEC 17025:2017 General Requirements for the Competence of Testing and Calibration Laboratories and ISO 9001 Quality Management System. Moreover, the labs prove their efficiency every year through tests conducted. Sustainability is aimed through fulfilling the tasks in accordance with the procedures and the instructions. Laboratory of Nadir Metal Refinery fulfill the requirements of the local and international standards and regulations by adopting to be developed constantly and improve to provide sustainable quality.



Laboratuvarların amacı, yüksek nitelikli personellerle, tarafsızlık ilkesi içerisinde, gizlilik prensibine dayanarak ve uluslararası metotlar kullanarak en uygun şartlarda analizleri gerçekleştirmektir.

Through accomplishing the inspections every year, Laboratories of Nadir Metal Refinery have been maintaining their warrant by the TURKAK accreditation and National Mint of the Republic of Turkey.

Years of Participation

Accredited by Turkak in **2009**

Accredited by National Mint of the Republic of Turkey in **2008**.

Nadir Metal Refinery Laboratory has analysed gold and silver by ISO 11426 (gold by fire assay), ISO 15093 (gold by Difference method using ICP-OES), ISO15096 (Silver by Difference method using ICP-OES), TS 7696 (silver by gravimetric determination) and ISO 13756 (silver by potentiometric titration) In the labs, the analysis of platinum group metals, as well as soil and ore analysis can be conducted. In this scope, we guarantee the analysis of chemical salts and rhodium plating solutions, intermediate product control of each stage of our process, analysis of gold-silver products to be presented to the national and international markets, analyzing of wastewaters to be discharged properly and to produce high quality products in our laboratories.

In line with the vision of research and development, laboratorial data has been obtained through a solution oriented team. Our research and development strategy is based on the ground that aims to improve the skills of the staff, and therefore to reach the level of developing its own technology

The labs constantly improve to provide sustainable quality and train the staff through internal and external trainings. Laboratory personnel completed 45 hours of training including technical and personal skills in 2019. The trainings have been repeated regularly and conspiratorially in accordance with the newer risks, new technologies and personnel requirements.

As Nadir Metal Refinery laboratory, we work by the principle of prevention of environmental pollution, reduction of wastes, efficient use of energy and responsible consumption of the natural resources within environmental responsibility.

Corporate Social Responsibility Projects

An Awareness Project From Our Country To The World

► Life un Us



Istanbul Mentally Handicapped Education and Solidarity Foundation (IZEV) established and launched in 2017 a project called “Life and Us “ which consists of three stages. The project, which is intended to cover 3 years, has extended its scope to 5 years with the national and international awards it has received and the high attention it has received.

The aim of the project is to ensure that different individuals identified as mentally disabled in our country participate in all aspects of life and to break down the walls in the minds by being applauded in all areas of society.



The project, which is carried out with the support of Nadir Metal Refinery, one of the main sponsors of the” Life and We “ project, is a Awareness Project that opens not only within the country but also to the whole world.



Champions

► Life is a sea, we are one of you

“The Istanbul Foundation for Education and solidarity for the mentally disabled” (IZEV) who put forward the slogan “Life is a sea, we are one of you”, aims to break down the walls in the minds in the name of awareness with the film “Champions”, which is about changing lives of mentally disabled young people with basketball, will transfer the film’s box office revenues to The Independent Life program. Within the scope of social responsibility, Nadir Metal Rafineri supports the project, which is a championship story from life.



Clean environment, Life Without Barriers

► Environment Guards



In the 4-Way project including environmental sensitivity, recycling, employment and socialization was launched by the IZEV Foundation in May 2019, individuals with special needs were trained in environmental sensitivity, recycling and waste oil, and then formed a special team for the project. The team, called environmental guards, creates awareness by contacting all companies that extract waste oil in their institutions and on-site. The project is supported through 4R environment and energy company, a group company of Nadir Metal Refinery



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