

SUSTAINABILITY POLICY

INTRODUCTION

As Troy Precious Metals Trade Inc. (Troy), which was established with the permission of the Undersecretariat of the Treasury of the Republic of Turkey and is a brokerage firm of Borsa İstanbul A.Ş. "Precious Metals and Precious Stones Market", we attach great importance to ensuring that our activities in the precious metals sector comply with environmental, social and governance standards and create long-term sustainable value. Acting with the awareness that natural resources are limited, we are committed to fulfilling our responsibilities towards society, our employees and our environment. We are resolutely pursuing our environmental sustainability goals to leave a more livable world for future generations.

1 – ENVIRONMENTAL SUSTAINABILITY

Troy adopts integrated and innovative strategies to reduce its environmental footprint and promote environmentally friendly practices. In this context, we take a multifaceted approach to energy management, carbon emissions, waste management and the protection of natural resources.

1.1. Carbon Emissions

- We use energy-efficient lighting systems and energy management systems in our offices to minimize carbon emissions.
- In corporate activities, we prefer electric and low-emission transportation vehicles.

1.2. Waste Management and Recycling

- We have recycling bins in our offices to ensure that our employees participate in waste separation and recycling in the office. We collect materials such as paper, plastic, glass and metal separately so that they can be recycled.
- We cooperate with authorized recycling centers to safely dispose of electronic items that have reached the end of their useful life. We also raise awareness among our employees about the recycling of electronic waste.
- We are switching to reusable alternatives to minimize the use of single-use plastic products in our offices. We are providing our employees with reusable cups, bottles and kitchen equipment.
- To save paper, we are switching to applications such as e-mail, e-invoice, e-archive, and e-ledger instead of printed documents.



1.3. Sustainable Use of Natural Resources

- To minimize water consumption, we pay attention to water consumption and saving with our employees in our offices.
- We follow technologies such as water recovery.
- We act carefully in protecting green areas. We aim to create green areas around the office.
- We work with suppliers who value environmental sustainability in our supply chain. We attach importance to ensuring that the precious metals we supply are sourced in a manner that causes the least harm to the environment and within the framework of sustainable mining practices.
- We provide training to all our employees at regular intervals to increase environmental awareness.

2 – SOCIAL SUSTAINABILITY

As Troy, we fulfill our responsibilities towards our clients, employees and business partners with great seriousness. We adopt high ethical standards in issues such as diversity, inclusiveness, employee welfare and social contribution.

2.1. Employee Rights and Safety

- We fully comply with national and international occupational health and safety standards. In this regard, we continue to constantly evaluate and improve the safety of our work environment.
- We take precautions to prevent work accidents by conducting regular risk assessments.
- We provide regular safety training to increase our employees' safety awareness and ensure that they are prepared for potential dangers. In addition, we organize first aid training for potential emergencies.
- We prioritize the protection of employee rights and fully comply with labor laws.
- We follow a fair and equal wage policy for all our employees, regardless of gender, age, ethnicity and other personal characteristics.
- We collect regular feedback to listen to our employees' experiences and suggestions in the workplace. In these processes, we evaluate our employees' demands regarding safety and rights and take steps towards improvement.

2.2. Social Contribution

- We contribute to the education of successful students with limited financial means by offering them scholarships.



- We carry out regular health screenings and awareness programs to support public health.
- We carry out projects to support women entrepreneurs in business life and encourage women's participation in the workforce.
- We prefer to cooperate with local suppliers in our business processes. In this way, we support local businesses to contribute to the economy and help develop the local economy.

3 – GOVERNANCE AND ETHICAL STANDARDS

As Troy, we operate in line with our corporate governance principles, and we are committed to creating a business culture based on transparency, accountability, ethical values and trust. We take care to conduct all our processes within the framework of the highest ethical standards by creating a strong governance structure.

3.1. Transparency and Accountability

- We regularly report on our corporate activities and financial status.
- We inform all our clients and business partners about important decisions and changes. We establish transparent communication through regular bulletins to ensure that they are informed about our organization's activities.
- We ensure that all processes are carried out in accordance with the law and ethical rules by effectively using internal and external audit mechanisms. Internal audit teams carry out regular checks and reporting by auditing every area from financial transactions to operational transactions.

3.2. Ethical Supply Chain Management

- We act in accordance with the principle of environmental and social responsibility in our precious metal supply chain.
- We follow a zero-tolerance policy against forced labor and child labor in our supply chain.

3.3. Business Ethics and Code of Conduct

- We have adopted an ethical code of conduct to ensure that our employees and management act in accordance with business ethics, honestly and fairly.
- In this regard, we have created an ethics policy and adopted the principle of acting in accordance with this policy.



- We have also created an “Anti-Bribery and Anti-Corruption Policy” regarding not accepting gifts and bribes, and we act in accordance with the principles in this policy with all our employees.

3.4. Client Privacy and Data Security

- We attach great importance to the privacy of our clients’ personal information. We perform our operations in accordance with the "Privacy Policy" that we have created in accordance with data security standards to ensure the security of all client information.
- We use advanced cybersecurity infrastructure to ensure client security. We continuously update and improve our security systems to minimize data leakage and misuse.
- We fully comply with local and international data privacy laws regarding the protection of client data.

3.5. Compliance and Adherence to Legal Regulations

- We act in accordance with local and international legal regulations in our business processes. In this context, we develop compliance programs and provide regular training so that all our employees are informed about relevant legal regulations.
- We ensure that our activities comply with legal regulations through internal and external audits, and we identify deficiencies and areas for improvement by conducting regular compliance audits.
- We operate in accordance with environmental, social and governance standards, closely follow the legal regulations regarding these standards and ensure full compliance.

4 – TRAINING AND AWARENESS

As Troy, we organize comprehensive training programs to increase awareness. We aim to strengthen our business culture and increase social benefit by ensuring that our employees have up-to-date information. We organize the training listed below periodically and act with the goal of continuous development.

- 1- Sustainability Training
- 2- Ethics Training Programs
- 3- Occupational Health and Safety Training
- 4- Data Security and Privacy Training
- 5- Diversity and Inclusion Trainings
- 6- Leadership and Personal Development Trainings



5 – IMPROVEMENT AND DEVELOPMENT

- As Troy, we constantly review our activities and act with an approach that encourages improvement and development. For this purpose, we monitor our corporate performance, and we determine our development steps in the areas of efficiency, environmental sustainability and social contribution. We organize our processes and ways of doing business in line with current requirements by evaluating the feedback we receive from our employees and clients.
- We aim to make our business processes faster, safer and more sustainable by following new technologies. With the training provided to our employees, we improve their skills and increase their qualifications that will contribute to Troy.
- Every year, we evaluate our environmental and social performance and identify areas for improvement to achieve our sustainability goals. In addition, by strengthening our risk management and internal control system, we ensure the legal compliance of our processes and ensure that we are prepared for crisis situations.
- We evaluate development opportunities through sectoral collaborations and take an active role in producing innovative solutions. In all these improvement and development activities, we aim to provide better service to our clients and business partners and create permanent value in society.

