



WHISTLEBLOWER POLICY

PL.12 | Issue Date: 1.08.2023 | R.00 | Revision Date: - | Review Date: 07.07.2025

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Scope: Modeling And Design Of Jewelry With Gold, Silver Precious Metals And Precious Stones (Diamonds), Production, Sale And Export

Sözer Kuyumculuk is committed to maintaining its leadership position in the industry and to adopting high ethical standards, transparency, and accountability in all business processes. In this context, our company has developed a secure and effective whistleblower policy for reporting unethical behavior, corruption, and activities contrary to policies or legal regulations. This policy is designed to protect whistleblowers and ensure that any potential violations are fairly investigated.

1.Scope and Purpose of the Policy

This whistleblower policy covers all employees, managers, customers, suppliers, and other stakeholders of Sözer Kuyumculuk. The purpose of the policy is to facilitate the safe, confidential, and anonymous reporting of violations and to ensure that reported violations are effectively evaluated and necessary corrective and preventive actions are taken. This policy reinforces the company's commitment to laws, ethical rules, and industry standards, while also promoting a culture of trust and honesty.

2.Subjects of Reporting

The range of issues that can be reported by whistleblowers includes, but is not limited to:

- Corruption, bribery, and fraud activities
- Behaviors contrary to company policies and procedures
- Non-compliance with legal and regulatory requirements
- Violations of occupational health and safety standards
- Violations of environmental protection standards
- Violations of human rights and labor standards
- Privacy and data protection breaches

3. Mechanism and Process of Reporting

Sözer Kuyumculuk provides multiple channels for easy and secure reporting. These channels include a specially designed hotline, email address, written letters, or a secure internet portal. Reports can be made anonymously, and all reports are treated with the highest degree of confidentiality. Each reported case undergoes an initial review and, if necessary, detailed investigations are conducted based on the seriousness and nature of the issue. The investigation process is based on principles of transparency, fairness, and prompt action.

OUR WHISTLEBLOWER CHANNELS

Via E-mail: compliance@sozer.com.tr

Via Web: sozer.com.tr/en/reporting-hotline

4.Protection and Confidentiality

Sözer Kuyumculuk places great importance on protecting the identities of whistleblowers and ensuring they do not face any retaliation or discrimination after making a report. The company explicitly prohibits any form of retaliation against whistleblowers and commits to taking serious action in case of violation.

5.Continuous Improvement and Training

The company will continuously review and improve the effectiveness and appropriateness of the whistleblower policy. Additionally, regular training and awareness programs will be conducted for employees on ethical behavior, combating corruption, and the importance of the whistleblower policy.

6.Policy Review and Update

This whistleblower policy will be regularly reviewed and updated to align with the company's needs, legal regulations, and best practices. The effective implementation of this policy is the responsibility of the company's management team, and all employees are expected to understand and apply this policy.



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APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Sözer Kuyumculuk Sanayi ve Ticaret Anonim Şirketi

PREPARED AND APPROVED BY SÖZER KUYUMCULUK BOARD OF DIRECTORS