



SUSTAINABLE PROCUREMENT POLICY

PL.14 | 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

Recognizing the risks associated with the extraction, trade, handling, and export of precious metals from conflict-affected and high-risk zones, and affirming our commitment to human rights and avoiding contributions to conflicts, Sözer Kuyumculuk adopts this policy. This policy is disseminated to our suppliers to raise their awareness and guide their compliance. The company undertakes to refrain from any actions that may contribute to the financing of conflicts and adheres to the relevant sanctioning resolutions of the United Nations and national laws implementing such resolutions.

As a member of the Responsible Jewellery Council (RJC), Sözer Kuyumculuk, through independent external audits, demonstrates that:

- It respects human rights in line with the Universal Declaration of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- It does not engage in or tolerate malfeasance, corruption, money laundering, or the financing of terrorism.
- It supports payment transparency.
- It does not provide direct or indirect support to armed groups.
- It has established a procedure allowing stakeholders to express concerns.
- It implements a management system for risk-based due diligence concerning responsible sourcing of minerals from conflict-affected and high-risk areas.

Procurement Principles

Sözer Kuyumculuk adheres to the following principles during the procurement process:

1. Zero Tolerance for Abuses

The company does not tolerate:

- Torture or cruel, inhuman, or degrading treatment.
- Forced or compulsory labor, including any labor or service performed under threat of punishment and not voluntarily offered.
- Child labor.
- Any other severe human rights abuses.
- War crimes, violations of international human rights law, crimes against humanity, or genocide.

2. Avoidance of Risky Trade Relationships

Sözer Kuyumculuk refrains from engaging in trade relationships with suppliers and customers where there is a reasonable risk of involvement in or association with human rights abuses or the aforementioned crimes.

3. No Support to Armed Groups

The company does not tolerate direct or indirect support through the purchase of precious metals to armed groups or their associates that:

- Control mining sites, transport routes, trading points, or actors upstream in the supply chain.
- Illegally tax or extort money or precious metals from mining sites, transport, or points of trade.
- Illegally tax or extort money or precious metals from intermediaries, export undertakings, or international traders.

4. Termination of Relationships with Non-Compliant Suppliers

Sözer Kuyumculuk will immediately terminate business relationships with suppliers if it identifies a reasonable risk



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that such suppliers may procure from or be connected to non-state armed groups through direct or indirect support.

5. **No Support to Public or Private Security Forces Engaging in Abuses**

The company commits to not providing direct or indirect support to public or private security forces that control, illegally tax, or extort money from mining sites, transport routes, or trading points.

6. **Proper Role of Security Forces**

The role of public or private security forces should be to ensure the safety of workers, facilities, equipment, and goods, in line with the rule of law and standards that protect human rights.

7. **Prohibition of Bribery and False Declarations**

Offering, promising, or soliciting bribes is strictly prohibited. Sözer Kuyumculuk opposes any attempt to conceal or falsify the origin of precious metals or make false declarations concerning taxes, duties, tariffs, and royalties paid to governments for extraction, trade, handling, transport, and export.

8. **No Tolerance for Money Laundering**

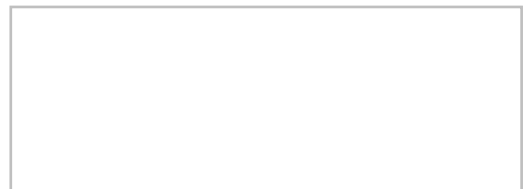
The company prohibits any form of money laundering and supports efforts to eliminate money laundering associated with the extraction, trade, transport, or export of precious metals.

Sözer Kuyumculuk requires all employees, agents, consultants, and trade partners to comply with this policy. To enforce it, suitable disciplinary actions will be implemented, including dismissal or termination of contracts, where necessary.

This policy is based on the principles outlined in the OECD Due Diligence Guidance for Responsible Supply Chains.

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