



LEGAL COMPLIANCE POLICY

PL.16 | Issue Date: 1.08.2023 | R.00 | Revision Date: - | Review Date: 07.07.2025

Page 1 / 2

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

1. PURPOSE

This policy details Sözer Kuyumculuk's commitment to full compliance with all applicable national and international laws, regulations, and sector standards in all operations, and describes the systems and practices in place to achieve this.

2. SCOPE

This policy applies to all Sözer Kuyumculuk employees, managers, subcontractors, suppliers, business partners, consultants, and to all company operations.

3. DEFINITIONS

- **Legal Compliance:** Acting in accordance with all applicable laws, regulations, directives, international conventions, sector rules, and standards.
- **Legal Register:** The official document where all applicable legal and regulatory requirements are recorded and periodically updated.
- **Non-Compliance:** Any case of failure to comply with a law, regulation, or RJC standard.

4. RESPONSIBILITIES

- **Top Management:** Oversees implementation, provides resources, applies sanctions for violations, and conducts annual review.
- **Quality and Compliance Manager:** Monitors legal developments, updates the legal register, coordinates training, reports non-compliance, and manages corrective actions.
- **Department Managers:** Ensure implementation and record-keeping of legal requirements in their area; report regularly.
- **All Employees:** Must comply with legal requirements and this policy, and report suspected non-compliance to their manager.

5. PRINCIPLES & COMMITMENTS

5.1 Compliance with Legislation

- Full adherence to all relevant national and international laws, regulations, standards, and permits in countries of operation.
- In case of conflict between national law and RJC requirements, the stricter requirement is applied, prioritizing legal compliance.

5.2 Monitoring Legal Developments

- All updates to laws, regulations, and standards are regularly monitored.
- Subscriptions to law firms, sectoral consultancies, and official bulletins are used for this purpose.
- The legal register is updated at least quarterly and immediately after any major change.

5.3 License and Permit Management

- All required licenses, permits, and certificates for operations are obtained and kept current.
- Applications and renewal processes are tracked using a calendar system.
- All licenses and permits are archived and ready for audits.

5.4 Risk Assessment and Control

- Legal compliance risks (occupational safety, remuneration, environment, product disclosure, finance, human rights, KYC/AML, etc.) are evaluated at least annually.
- Any non-compliance triggers immediate corrective action.

5.5 Training and Awareness

- Employees and subcontractors receive at least annual training in legal compliance, ethics, anti-bribery, KYC/AML, and human rights.
- Records of all trainings are maintained; orientation is mandatory for new hires.



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Page 2 / 2

5.6 Communication, Reporting, and Records

- Legal developments are communicated internally through bulletins and announcements.
- All legal notifications, permits, audit reports, applications, training records, communications, and corrective actions are documented and stored for at least 5 years.
- Legal compliance is specifically monitored in internal audits and discussed in management reviews.

5.7 Cooperation and Transparency

- Full cooperation with public authorities during audits and investigations; all information and documents are provided promptly.
- Legal or consultancy support is sought when necessary.

5.8 Policy Violations

- Any non-compliance is reported to top management and, if necessary, to legal authorities; corrective and preventive actions are planned.
- Intentional or deliberate violations are subject to disciplinary procedures.

6. POLICY REVIEW AND UPDATE

- The policy is reviewed at least annually and whenever there are significant changes in legislation or RJC standards.
- Revisions are published with top management approval.

7. ENFORCEMENT AND PUBLICATION

- This policy is distributed to all company units, published on the company website, and made accessible to all stakeholders.

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