



FORCED LABOUR POLICY

PL.17 | 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

1. PURPOSE

This policy defines Sözer Kuyumculuk's strict prohibition of all forms of forced labour, coercion, debt bondage, threats, human trafficking, and similar practices in its operations and throughout its supply chain. It details our commitment to RJC COP and all relevant legal requirements.

2. SCOPE

This policy applies to all Sözer Kuyumculuk employees, managers, subcontracted and agency workers, interns, temporary staff, suppliers, business partners, and consultants.

3. DEFINITIONS

- **Forced Labour:** Any work or service extracted from a person under threat, coercion, debt, violence, fraud, human trafficking, passport withholding, or any means depriving them of their free will.
- **Debt Bondage:** Forcing a person to work to repay a debt.
- **Human Trafficking:** The recruitment, transport, transfer, or harbouring of persons, by means of threat, force, or fraud, for the purpose of exploitation.

4. RESPONSIBILITIES

- **Top Management:** Ensures the implementation and effectiveness of this policy, allocates resources, and applies disciplinary measures for violations.
- **HR & Quality-Compliance Manager:** Analyses forced labour risk in all recruitment and work processes, coordinates training and audits, and manages the grievance mechanism.
- **All Employees and Managers:** Must promptly report any suspected or observed indicators of forced labour.

5. POLICY STATEMENTS AND COMMITMENTS

5.1 Prohibitions and Core Commitments

- Any form of forced, coerced, bonded, or threat-induced work is strictly forbidden within the company.
- Employees are free to resign at any time; no one shall be deprived of their liberty.
- This policy is communicated to all employees, subcontractors, and suppliers in writing and/or verbally.

5.2 Implementation and Preventive Mechanisms

- **Recruitment:**
 - All recruitment and selection processes are conducted transparently, fairly, and based on voluntary participation.
 - No recruitment or placement fees, deposits, or document guarantees are demanded from employees.
 - Passports, IDs, bank cards, or other personal documents are never retained.
 - Third-party labour providers are audited for compliance with this policy.
- **Working Conditions:**
 - No threats, coercion, violence, disciplinary actions, wage deductions, or psychological/physical pressure are used to extract work.
 - Overtime is strictly voluntary; employees are not obliged to work overtime without consent.
- **Debt Bondage & Human Trafficking:**
 - Any suspected cases in the company or supply chain are immediately investigated and reported.
- **Legal and Contractual Rights:**
 - Employees are provided with a written employment contract; all terms and conditions are clearly communicated.
 - No one is forced to sign a contract; all terms comply with law and RJC standards.

5.3 Risk Assessment and Audits

- All new hires, subcontracting, and temporary work are reviewed at least annually for forced labour risk.
- Suppliers and subcontractors receive this policy, sign commitments, and undergo document/field audits.
- Any detected non-compliance triggers an immediate action plan and reporting.



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5.4 Training and Awareness

- All employees receive at least annual training on forced labour and human rights; new hires undergo mandatory orientation.
- Information/training sessions are provided for suppliers and subcontractors.

5.5 Grievance and Reporting Mechanism

- Employees and stakeholders can confidentially and safely report any suspicion or incident via the grievance mechanism.
- All reports are handled sensitively, promptly, and confidentially; retaliation is strictly forbidden.

5.6 Sanctions and Corrective Actions

- Any violation leads to disciplinary action and, if necessary, notification of authorities.
- Corrective and preventive actions are planned, tracked, and documented for all cases.

5.7 Continuous Review

- The effectiveness of this policy is reviewed at least annually and updated as necessary according to audit results and legal changes.

6. PUBLICATION AND ACCESS

- This policy is distributed to employees and business partners, posted on noticeboards and the company website, and made available to all stakeholders upon request.

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