



# NON-DISCRIMINATION & DIVERSITY POLICY

PL.18 | 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 sets forth Sözer Kuyumculuk's commitment to preventing discrimination and promoting diversity, equity, and inclusion in all activities. It is aligned with national law, RJC COP, ILO conventions, and international best practices.

## 2. SCOPE

This policy applies to all Sözer Kuyumculuk employees, managers, candidates, interns, subcontractors, suppliers, business partners, and any third parties associated with company operations.

## 3. DEFINITIONS

- **Discrimination:** Any negative or different treatment based on age, gender, ethnicity, language, religion, belief, political opinion, marital status, social origin, disability, pregnancy, family status, sexual orientation, gender identity, union membership, military status, physical appearance, or similar grounds.
- **Diversity:** Recognition and encouragement of individuals from different demographic, cultural, social, and intellectual backgrounds within the organization.
- **Inclusion:** Providing a fair and supportive environment where every individual can participate, be represented, and develop.

## 4. RESPONSIBILITIES

- **Top Management:** Oversees, monitors, and improves policy implementation; drives cultural change and allocates necessary resources.
- **HR & Quality-Compliance Manager:** Monitors all processes for discrimination risks, manages complaints, and coordinates training and awareness programs.
- **Department Managers:** Ensure equality and inclusivity in all team processes.
- **Employees:** Remain vigilant against discrimination, harassment, exclusion, or bullying, and report violations to managers or through the grievance mechanism.

## 5. POLICY STATEMENTS AND COMMITMENTS

### 5.1 Fundamental Principles and Prohibitions

- No discrimination is allowed in recruitment, promotion, compensation, benefits, discipline, work allocation, training, dismissal, or any business process for any of the above reasons.
- Sexual harassment, mobbing, exclusion, verbal or physical assault, ridicule, or demeaning behavior are strictly forbidden.
- Full compliance with the principle of equal opportunity is ensured.

### 5.2 Diversity and Inclusion

- Participation and contribution from individuals of different backgrounds are encouraged; diversity is viewed as a strength.
- Reasonable accommodations are made for employees with disabilities or different beliefs/identities; all barriers are removed.

### 5.3 Implementation and Monitoring

- Recruitment, orientation, promotion, training, and all personnel processes include controls to prevent discrimination.
- Inclusive language and visuals are used in all announcements, documents, and communications.
- Anti-discrimination commitments are also obtained from suppliers and subcontractors.

### 5.4 Training and Awareness

- Annual training is provided to all employees on non-discrimination, diversity, equity, and inclusion.
- New hires are informed about policies and procedures during orientation.

### 5.5 Grievance and Reporting Mechanism

- Everyone can safely, confidentially, and without fear of retaliation use the grievance mechanism to report discrimination or inappropriate behavior.



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- Complaints are handled diligently, swiftly, and confidentially; violations are subject to disciplinary process and corrective actions.

### 5.6 Monitoring, Evaluation, and Reporting

- The effectiveness of the policy is evaluated at least annually by top management, and improvements are made as necessary.
- Diversity and equity indicators are reported and analyzed annually.

### 6. PUBLICATION OF THE POLICY

- The policy is openly communicated to employees and stakeholders, and published on noticeboards, the intranet, and the company website.

### 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*