



GRIEVANCE & COMPLAINT MECHANISM POLICY

PL.20 | 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 ensures that all Sözer Kuyumculuk employees, subcontractors, suppliers, and stakeholders have the right to raise grievances or disputes in a safe, accessible, impartial, and non-retaliatory environment, and that all such concerns are addressed fairly and transparently. The policy is aligned with RJC COP, national legislation, and ILO standards.

2. SCOPE

This policy applies to all employees, managers, subcontractors, suppliers, business partners, customers, local communities, and other external stakeholders of the company.

3. DEFINITIONS

- **Grievance:** Any report or concern raised by an individual or group regarding harm, unfair treatment, or adverse impact caused by company activities or behavior.
- **Dispute:** A conflict or disagreement between the company and an employee, supplier, customer, or other stakeholder that requires resolution.
- **Retaliation:** Any negative action taken against a person who raises or supports a grievance (dismissal, threat, intimidation, exclusion, etc.).
- **Anonymity:** The complainant can choose to remain anonymous.

4. RESPONSIBILITIES

- **Top Management:** Ensures the implementation, resource allocation, and effectiveness of the mechanism.
- **Quality-Compliance Manager:** Responsible for operating the mechanism, conducting training and communications, and managing records and reports.
- **All Managers:** Encourage staff to use the grievance process, ensure fair handling of grievances.
- **Employees and Stakeholders:** Have the right to raise grievances or disputes confidentially.

5. POLICY STATEMENTS AND OPERATION

5.1 Accessibility and Communication

- The grievance mechanism is free, easily accessible, understandable, and culturally appropriate for all.
- The mechanism is regularly communicated to all stakeholders through announcements, training, handbooks, email, and the company website.

5.2 Reporting Channels

- Written submission (email, form, website, internal dropbox)
- Oral reporting (to a manager, HR, or compliance officer)
- Anonymous reporting (anonymous box, unsigned form, via a third party)

5.3 Assessment and Confidentiality

- All grievances are reviewed promptly, impartially, confidentially, and without prejudice.
- The identity and details of complainants are shared only with authorized personnel; data privacy is fully protected.

5.4 Timelines and Reporting

- All reports are registered within 3 business days and acknowledgment is sent to the complainant.
- Final assessment is completed within 30 days (or sooner, as appropriate), and the complainant is informed about the process and outcome.

5.5 Resolution, Corrective and Preventive Action

- If a grievance is found valid, corrective and preventive actions are implemented immediately.
- The entire process is documented; lessons learned and system improvements are reviewed by management at least annually.

5.6 Non-Retaliation and Protections

- No employee, supplier, or stakeholder shall suffer retaliation for raising a grievance or dispute; retaliation is strictly prohibited.



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- Grievances are handled fairly, impartially, and transparently.

5.7 Legal Rights and Other Avenues

- The grievance mechanism does not limit the right to pursue legal or regulatory remedies.
- Use of the internal mechanism is voluntary and does not preclude legal action.

5.8 Monitoring and Review

- The effectiveness of the mechanism is reviewed at least annually by management and improved as necessary.

6. PUBLICATION OF THE POLICY

- The policy and reporting channels are published on company noticeboards, handbooks, the website, and included in all training materials.

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