



TRAINING & AWARENESS POLICY

PL.23 | 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 aims to ensure that all Sözer Kuyumculuk employees, subcontractors, and relevant stakeholders are sufficiently informed and continuously competent regarding the company's legal, ethical, environmental, human rights, and sustainability commitments.

2. SCOPE

This policy applies to all employees, managers, interns, subcontractors, suppliers, and all business partners involved in company activities.

3. RESPONSIBILITIES

- **Top Management:** Provides necessary resources and approves policies and training plans.
- **HR & Quality-Compliance Manager:** Responsible for needs analysis, annual training plan, preparation and delivery of training content, keeping participation records, and measuring effectiveness.
- **Department Managers:** Monitor the needs of their teams and ensure attendance to relevant training programs.
- **Employees & Subcontractors:** Required to participate in designated training and awareness programs and keep their knowledge up-to-date within their area of responsibility.

4. POLICY STATEMENTS AND PRINCIPLES

4.1 Training & Awareness Areas

- Covers legal compliance, ethical business practices, human rights, non-discrimination, forced and child labour, environment, occupational health & safety, anti-bribery, supply chain responsibility, information security, confidentiality, etc.
- All internal policies and procedures are included in annually updated training programs.

4.2 Needs Analysis & Annual Planning

- Orientation, periodic (annual), and event-driven (e.g. regulatory changes, new processes, new risks) trainings are planned for all employees.
- Training needs analysis is conducted at least annually; additional trainings are organized as new needs are identified.

4.3 Training Methods & Delivery

- Face-to-face training, online platforms, workshops, internal communication materials (posters, brochures), tests, and assessments are used.
- External experts, consultants, or third-party programs are involved when needed.
- Separate information/training sessions are organized for suppliers and subcontractors.

4.4 Records, Monitoring & Effectiveness

- All trainings and attendance are recorded; knowledge tests and/or feedback surveys are conducted to measure effectiveness.
- Training results are reviewed annually in management review meetings and integrated into improvement plans.

4.5 Continuous Development & Equal Opportunity

- Equal opportunity is ensured for all employees; no barriers to accessing training.
- Continuous learning and development are supported; employee suggestions and feedback are encouraged.

5. PUBLICATION OF THE POLICY

- The policy and annual training plan are published on company noticeboards, the intranet, and employee handbooks, and communicated to all staff regularly.



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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