



HUMAN RIGHTS POLICY

PL.06 | 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

Introduction

Sözer Kuyumculuk is committed to upholding and promoting human rights across all aspects of its operations, ensuring that every individual associated with the company—whether as employees, contractors, suppliers, or community members—is treated with dignity, fairness, and respect. This policy aligns with international frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), ILO Core Conventions, and Universal Declaration of Human Rights (UDHR).

Policy Scope

This Human Rights Policy applies to:

1. Employees: Full-time, part-time, and temporary workers at all levels.
2. Contractors and Suppliers: Third parties providing goods or services to Sözer Kuyumculuk.
3. Communities: Local communities impacted by Sözer Kuyumculuk's operations.
4. Stakeholders: Business partners, customers, and all individuals within Sözer Kuyumculuk's supply chain.

Key Commitments

1. Respect for Fundamental Rights

Sözer Kuyumculuk commits to respecting and protecting the following fundamental rights:

- Right to Life: Ensuring safe and healthy working conditions to protect employees from harm.
- Freedom from Discrimination: Prohibiting discrimination based on race, gender, religion, age, disability, sexual orientation, or other status.
- Right to Just and Favourable Working Conditions: Providing fair wages, reasonable working hours, and a safe, respectful work environment.
- Freedom of Association and Collective Bargaining: Supporting employees' rights to form and join trade unions and engage in collective bargaining.
- Prevention of Child and Forced Labour: Strictly prohibiting child labour, forced labour, and human trafficking within Sözer Kuyumculuk's operations and supply chain.

2. Due Diligence and Risk Management

Sözer Kuyumculuk conducts ongoing human rights due diligence to identify, prevent, and mitigate potential risks:

- Supply Chain Audits: Regular monitoring of suppliers to ensure compliance with human rights standards.
- Impact Assessments: Evaluating the potential impact of operations on local communities and workers.
- Grievance Mechanisms: Establishing accessible and confidential channels for reporting human rights violations.

3. Equal Opportunity and Inclusion

Sözer Kuyumculuk fosters a workplace culture of diversity, equity, and inclusion by:

- Providing equal opportunities for hiring, promotion, and development.
- Ensuring gender equality in leadership and decision-making roles.
- Supporting individuals with disabilities through accommodations and accessible infrastructure.

4. Health and Safety

The safety and well-being of all employees are top priorities. Sözer Kuyumculuk implements:

- Comprehensive health and safety policies and regular training sessions.
- Strict adherence to national and international occupational safety standards.
- Proactive measures to identify and address workplace hazards.

5. Engagement with Stakeholders

Sözer Kuyumculuk actively engages stakeholders to promote human rights throughout its operations and supply chain:

- Collaborating with suppliers, contractors, and partners to uphold shared values.
- Communicating human rights expectations through contracts, policies, and regular dialogues.
- Participating in industry initiatives and multi-stakeholder forums to advance human rights practices.



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Implementation and Accountability

Policy Integration

Human rights principles are integrated into all corporate policies, including health and safety, diversity and inclusion, supplier code of conduct, and environmental sustainability.

Training and Awareness

- Regular training programs for employees and suppliers to raise awareness of human rights issues and responsibilities.
- Distribution of educational materials and toolkits to reinforce the company's commitment to human rights.

Monitoring and Reporting

- Annual reviews of human rights performance with key performance indicators (KPIs).
- Transparent reporting through sustainability and annual reports.
- External audits to ensure compliance with international standards.

Grievance Mechanism

Sözer Kuyumculuk provides a safe, accessible, and confidential mechanism for individuals to report human rights concerns, including:

sozer.com.tr/en/reporting-hotline
compliance@sozer.com.tr

1. Anonymous Reporting: Through an online portal or suggestion box.
2. Investigation Process: Prompt and impartial investigation of all reported issues.
3. Remediation: Timely and effective resolution of valid complaints, including corrective actions and support for affected individuals.

Governance

The Human Rights Committee, comprising senior management and external advisors, oversees the implementation of this policy. The committee meets quarterly to review progress, address challenges, and ensure alignment with global best practices.

Public Commitment

Sözer Kuyumculuk's Human Rights Policy is publicly available on its website, communicated to all employees, suppliers, and stakeholders, and integrated into contracts and operational processes.

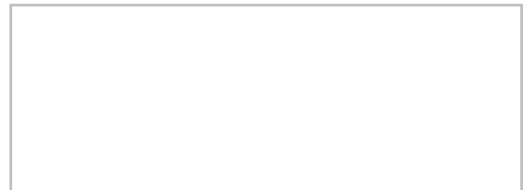
Conclusion

Sözer Kuyumculuk believes that respecting and promoting human rights is not only a moral obligation but also a business imperative. Through this policy, Sözer Kuyumculuk strives to create a sustainable and inclusive future for all stakeholders.

This policy will be reviewed annually and updated to reflect evolving best practices and stakeholder feedback.

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