Scope: Modeling And Design Of Jewelry With Gold, Silver Precious Metals And Precious Stones (Diamonds), Production, Sale And Export

Sözer Kuyumculuk, specializing in gold, silver, and diamond jewelry, is committed to conducting its business with integrity, transparency, and respect for human rights and environmental standards. This policy outlines the due diligence process for ensuring ethical sourcing and responsible business practices in the procurement and sale of gold, silver, and diamond jewelry.

Purpose
The purpose of this policy is to establish a robust framework for identifying, assessing, and mitigating risks associated with the sourcing and supply chain of gold, silver, and diamonds. This includes risks related to conflict financing, human rights abuses, and environmental degradation.

Due Diligence Process, Risk Assessment
•Conduct regular risk assessments to identify potential ethical and compliance risks in the supply chain of gold, silver, and diamonds.
•Pay special attention to sourcing from conflict-affected and high-risk areas (CAHRAs).

Supplier Vetting and Verification:
•Vet and verify suppliers through comprehensive background checks, ensuring they comply with international human rights, labor, and environmental standards.
•Require suppliers to provide proof of origin and certification, such as the Kimberley Process Certification Scheme for diamonds.

Chain of Custody and Traceability
•Implement traceability systems to track the movement of gold, silver, and diamonds from their source to final product. Ensure a transparent chain of custody to guarantee that materials are conflict-free and sourced ethically.

Compliance and Monitoring
•Conduct regular audits and inspections of suppliers to ensure ongoing compliance with this policy.
•Employ third-party auditors when necessary to provide an unbiased assessment of compliance efforts.

Risk Mitigation and Corrective Actions
•Develop and implement corrective action plans for any identified risks or noncompliance within the supply chain.
•Engage with suppliers to improve practices and remediate adverse impacts.

Reporting and Transparency:
•Maintain detailed records of due diligence efforts, audits, and compliance measures.
•Publish annual sustainability and compliance reports to communicate efforts and progress to stakeholders.

Training and Awareness
•Provide training to employees and business partners on ethical sourcing, compliance, and the importance of due diligence.
•Raise awareness about the social, environmental, and ethical implications of gold, silver, and diamond sourcing.

Policy Review and Updates
•This policy will be reviewed annually or more frequently as needed to reflect changes in regulations, industry standards, and company operations.
•Updates will be communicated to all relevant parties in a timely manner.

Enforcement and Compliance
•Non-compliance with this policy will result in disciplinary actions, up to and including termination of contracts for suppliers and legal actions where applicable.
•Encourage employees and external stakeholders to report violations of this policy through established reporting channels, ensuring confidentiality and protection from retaliation.

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