

Scope: Modeling and Design Of Jewelry with Gold and Silver Precious Metals Production, Sale and Export

1. Policy Statement

Milan Jewellery adopts a zero-tolerance approach to child labour and is fully committed to protecting the rights, safety, education, and well-being of children in accordance with RJC Code of Practices, Sedex SMETA / ETI Base Code, ILO Conventions No. 138 and 182, the UN Convention on the Rights of the Child, and applicable national labour legislation.

2. Scope and Applicability

This policy applies to all employees, interns, contractors, subcontractors, suppliers, service providers, and business partners.

3. Definitions

Child Labour: Any work performed by a person below the minimum legal working age.

Minimum Working Age: The higher of 15 years or the completion age of compulsory education.

Young Workers: Persons aged 15–17 and, where permitted by law, 18 years, subject to strict protection.

4. Prohibition of Child Labour

Child labour is strictly prohibited in all operations and supply chain activities.

5. Young Workers & Internship Conditions (15–17)

Individuals aged 15–17 may only work as school-attending interns with official school approval and written internship agreements. Out-of-school individuals in this age group are strictly prohibited.

6. Employment Conditions for Persons Under 19

Internships: Out-of-school individuals under 19 are not accepted as interns.

Employment at Age 18: Individuals aged 18 may work only if permitted by local law and if they are documented high school graduates.

7. Protection of Young Workers

Young workers shall not perform hazardous work, night work, overtime, or tasks involving chemicals, precious metal melting, heavy machinery, or toxic substances.

8. Age Verification

Official identification is required prior to employment or internship and retained in personnel records.

9. Supply Chain

Suppliers must comply fully with this policy and cooperate with audits.

10. Auditing and Monitoring

Compliance is monitored through internal and external audits.

11. Remediation

Child-centred remediation plans will be implemented if child labour is identified.

12. Training and Awareness

Regular training is provided to employees and suppliers.

13. Grievance Mechanism

Reports may be submitted confidentially via "<https://milanjewellery.com/hotline>". Retaliation is prohibited.

14. Responsibilities

Top Management, HR, Compliance Officers, and Suppliers share responsibility.

15. Continuous Improvement

Policies and risks are reviewed regularly.

16. Policy Review

Reviewed annually or upon regulatory or standard changes.



MİLAN

CHILD LABOR POLICY

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Commitment

Milan Jewellery commits to ethical practices and the elimination of child labour.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Milan Hediyelek Eşya Sanayi Ve Ticaret Anonim Şirketi

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