

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

Document Owner: Compliance & Sustainability Department

Approved By: Top Management

Review Cycle: Annual or New national /international law implant

1. Purpose and Commitment

Milan Jewellery is committed to conducting all business activities with the highest standards of ethics, integrity, transparency, and legal compliance. This Code of Ethics establishes the principles and rules guiding our conduct across all operations, aligned with national legislation and international standards including MASAK, OECD, RJC, SMETA, FATF, and UN principles.

2. Compliance with Laws and Regulations

Milan Jewellery fully complies with all applicable national and international laws and regulations in the countries of operation. Employees are required to understand and comply with all legal and internal requirements relevant to their roles.

3. Anti-Money Laundering (AML) and Counter Terrorist Financing (CFT)

Milan Jewellery maintains robust AML/CFT controls in line with Turkish AML legislation, MASAK regulations, FATF 40 Recommendations, and international best practices. This includes customer due diligence (KYC/KYS), transaction monitoring, suspicious activity reporting, and record retention.

4. Anti-Bribery, Corruption and Facilitation Payments

Bribery, corruption, and facilitation payments are strictly prohibited. No employee may offer, give, solicit, or accept any improper advantage. All business must be conducted fairly and transparently.

5. Gifts, Hospitality, Donations and Sponsorships

Gifts or hospitality must be modest, infrequent, and compliant with company procedures. Cash or cash-equivalent gifts are prohibited. Donations and sponsorships require prior management approval and due diligence to prevent misuse.

6. Conflict of Interest

Employees must avoid situations where personal interests conflict with company interests. Any potential conflict must be declared immediately and managed transparently.

7. Fair Competition and Antitrust

Milan Jewellery supports fair competition and strictly prohibits price fixing, market sharing, collusion, or exchange of sensitive information with competitors.

8. System of Warranties (Diamonds)

Milan Jewellery complies fully with the World Diamond Council System of Warranties, ensuring diamonds are conflict-free and responsibly sourced.

9. Disclosure of Treated Diamonds, Synthetics and Simulants

Full disclosure is provided regarding treated, synthetic, or simulant diamonds and gemstones, ensuring customer transparency.

10. Responsible Sourcing of Diamonds and Gemstones (OECD)

Milan Jewellery implements the OECD Due Diligence Guidance for Responsible Supply Chains, including:

- Establishing strong management systems
- Identifying and assessing supply chain risks
- Designing and implementing risk mitigation strategies
- Supporting independent third-party audits
- Public reporting on due diligence efforts

11. Responsible Sourcing of Gold, Silver and Platinum Group Metals

Precious metals are sourced responsibly from approved suppliers aligned with human rights, environmental, and ethical standards.

12. Supply Chain Management

Suppliers and contractors must comply with Milan Jewellery's ethical standards. Risk-based assessments, audits, and corrective action plans are applied where necessary.

13. Employment Practices

Milan Jewellery upholds fair employment, non-discrimination, freedom of association, fair wages, and respectful workplace practices.

14. Child Labour and Young Workers

Child labour is strictly prohibited. Young workers are employed only in compliance with law, education requirements, and company policy.

15. Forced Labour and Human Rights

Forced, bonded, or involuntary labour is prohibited. Human rights are respected across all operations and supply chains.

16. Health and Safety

Milan Jewellery provides a safe and healthy workplace, complying with occupational health and safety laws and best practices.

17. Environmental Protection

The company is committed to environmental stewardship, pollution prevention, responsible resource use, and compliance with environmental regulations. Accredited ISO-14001

18. Data Protection and Confidentiality

Personal data, customer information, trade secrets, and business data are protected in accordance with data protection laws and internal security policies.

19. Sanctions, Export Controls and Restricted Parties

Milan Jewellery complies with applicable sanctions, embargoes, and export control regulations and screens business partners accordingly.

20. Whistleblowing and Non-Retaliation

Stakeholders may report concerns confidentially via;

- compliance@milanjewellery.com
- <https://milanjewellery.com/hotline>

Anonymous reporting is permitted. Retaliation against whistleblowers is strictly prohibited.

21. Training and Awareness

Regular training is provided to employees and relevant suppliers to ensure awareness and compliance with this Code.

22. Monitoring, Audits and Corrective Actions

Compliance is monitored through internal controls, audits, and corrective action plans.

23. Disciplinary Measures

Violations of this Code may result in disciplinary action, including termination of employment or business relationships.

24. Continuous Improvement

Milan Jewellery continuously improves its ethical practices based on risk assessments, audits, and stakeholder feedback.

25. Policy Review

This Code of Ethics is reviewed annually or when significant legal or operational changes occur.

Commitment

Milan Jewellery reaffirms its commitment to ethical conduct, responsible sourcing, and sustainable business practices.



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CODE OF ETHICS POLICY

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APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

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