

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

1. Purpose and Scope

This Corporate Policy defines the overarching principles and governance framework of Milan Jewellery. It serves as the umbrella policy guiding all corporate, operational, ethical, social, environmental, and compliance-related activities of the company.

This policy applies to all employees, management, contractors, suppliers, and business partners of Milan Jewellery.

2. Corporate Governance and Policy Framework

Milan Jewellery operates under an Integrated Management System (IMS) that ensures compliance with applicable laws, international standards, and ethical principles.

The policy hierarchy is structured as follows:

- Corporate Policy (PL.04)
- Thematic and Functional Policies (PL.01–PL.14)
- Procedures, work instructions, and records

Top Management is responsible for approving this policy and ensuring its effective implementation. The Compliance & Sustainability Department oversees monitoring, implementation, and continuous improvement.

3. Ethics, Integrity and Legal Compliance

Milan Jewellery is committed to conducting business with integrity, transparency, and accountability.

This commitment is implemented through:

- PL.01 AML & KYC Policy
- PL.03 Code of Ethics
- PL.11 RJC Code of Conduct Policy

All forms of bribery, corruption, money laundering, terrorism financing, and facilitation payments are strictly prohibited.

4. Human Rights, Labour Practices and Workplace Conditions

Milan Jewellery respects internationally recognized human rights and labour standards.

This commitment is implemented through:

- PL.02 Child Labour Policy
- PL.06 Human Rights Policy
- PL.07 Occupational Health & Safety Policy

The company prohibits child labour, forced labour, discrimination, and ensures safe, healthy, and respectful working conditions.

5. Responsible Sourcing and Supply Chain Management

Milan Jewellery is committed to responsible sourcing and supply chain due diligence in accordance with the OECD Due Diligence Guidance.

This commitment is implemented through:

- PL.08 OECD Due Diligence Policy
- PL.13 Supply Chain Compliance Policy
- PL.14 Sustainable Procurement Policy

Risk-based supplier assessment, monitoring, corrective actions, and disengagement mechanisms are applied where necessary.

6. Environmental Responsibility and Quality Management

Milan Jewellery is committed to environmental protection, sustainable resource use, and product quality.

This commitment is implemented through:

- PL.05 Environmental Policy
- PL.10 Quality Policy

The company aligns its management systems with ISO 9001, ISO 14001, and ISO 45001 principles.

7. Product Integrity, Data Protection and Security

Milan Jewellery ensures product integrity, secure handling of materials, and protection of personal and business data.

This commitment is implemented through:

- PL.09 Personal Data Protection Policy
- PL.11 RJC Code of Conduct Policy

8. Reporting, Grievance Mechanism and Non-Retaliation

Milan Jewellery provides accessible and confidential reporting channels for concerns related to ethics, compliance, or policy violations.

This commitment is implemented through:

- PL.12 Whistleblowing Policy

Retaliation against whistleblowers is strictly prohibited.

9. Monitoring, Enforcement and Disciplinary Actions

Compliance with this Corporate Policy is monitored through internal controls, audits, and management reviews. Violations may result in disciplinary actions, including termination of employment or business relationships.

10. Continuous Improvement and Policy Review

Milan Jewellery is committed to continuous improvement of its management systems and ethical practices. This policy is reviewed annually or upon significant regulatory, operational, or standard changes.

Corporate Commitment

Milan Jewellery reaffirms its commitment to ethical conduct, responsible sourcing, respect for human rights, environmental stewardship, and sustainable business practices.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Milan Hediyelek Eşya Sanayi Ve Ticaret Anonim Şirketi

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