



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

1. Purpose and Scope

The purpose of this Supply Chain Compliance & Responsible Sourcing Policy ("Policy") is to define Milan Jewellery's expectations for ethical, social, environmental, and governance standards across its supply chain and to guide the selection, onboarding, monitoring, and management of Business Partners.

This Policy forms an integral part of the Milan Jewellery Code of Ethics and applies to:

- All **employees, directors, and officers** of Milan Jewellery
- All **Business Partners**, including suppliers, distributors, contractors, service providers, agents, and consultants
- All sourcing, production, sales, and export activities

Each Milan Jewellery business unit is responsible for ensuring that Business Partners are informed of, understand, and comply with this Policy.

2. Definitions

- **Business Partners:** Suppliers, distributors, authorized service providers, representatives, independent contractors, and consultants.
- **Human Rights:** Rights inherent to all individuals, as recognized by the **UDHR, ILO Core Conventions, and UN Guiding Principles on Business and Human Rights.**
- **ILO:** International Labour Organization.
- **Money Laundering:** Concealment or conversion of proceeds derived from criminal activity.
- **Sanctions Target:** Any individual, entity, or jurisdiction subject to international sanctions or embargoes.
- **UN Global Compact:** United Nations initiative promoting responsible business practices.

3. General Principles

Milan Jewellery applies a **risk-based approach** to supply chain management and selects Business Partners based on:

- Technical capability and service/product quality
- Financial soundness and corporate reputation
- Compliance with ethical, social, and environmental standards

To manage supply chain risks, Milan Jewellery implements:

- **Third-Party Screening** to ensure Business Partners and beneficial owners are not sanctions targets
- **Contractual Commitments** to this Policy and the Milan Jewellery Code of Ethics
- **Monitoring and Audits**, including desk-based or on-site assessments where necessary
- **Training and Awareness** to communicate expectations

4. Business Partner Onboarding and Due Diligence

Prior to engagement, Milan Jewellery conducts due diligence proportionate to the risk profile of the Business Partner, including:

- **Denied Party / Sanctions Screening**
- KYC-AML
- Completion of **self-assessment questionnaires**
- Review of legal, ethical, labour, environmental, and reputational risks
- QECD Due Diligence Annex II Compliance and procedures

Where red flags are identified, **Enhanced Due Diligence** may be conducted. Approval from senior management is required before proceeding.

Milan Jewellery reserves the right to:

- Include audit and compliance clauses in contracts
- Suspend or terminate relationships in cases of non-compliance

5. Guiding Principles for Business Partners

Business Partners are expected to comply with the following principles.

5.1 Compliance with Laws and Regulations

Business Partners must comply with all applicable laws, including those related to:

- Competition
- Anti-bribery and anti-corruption
- Anti-money laundering and counter-terrorism financing
- Data protection and privacy



5.2 Human Rights – Zero Tolerance

Business Partners must respect internationally recognized human rights and apply **zero tolerance** for:

- Child labour
- Forced, bonded, or compulsory labour
- Human trafficking and modern slavery

5.3 Labour Rights and Working Conditions Business Partners must:

- Comply with labour laws and ILO standards
- Provide fair wages and lawful working hours
- Respect freedom of association and collective bargaining
- Prohibit discrimination and harassment

5.4 Health and Safety

Business Partners must provide a safe and healthy working environment by:

- Identifying and managing occupational risks
- Providing training and protective equipment
- Complying with applicable health and safety regulations

5.5 Environmental Responsibility

Business Partners are expected to:

- Comply with environmental laws and permits
- Minimize environmental impacts
- Manage waste, emissions, and chemicals responsibly
- Continuously improve environmental performance

5.6 Ethics and Integrity

Business Partners must conduct business with integrity and fairness, including:

- Zero tolerance for bribery, corruption, and fraud
- Accurate recordkeeping
- Ethical and transparent business practices

5.7 Reporting and Grievance Mechanisms

Business Partners must:

- Maintain effective channels for reporting concerns
- Protect whistleblowers from retaliation
- Cooperate with investigations and corrective actions

6. Training and Capacity Building

Milan Jewellery encourages Business Partners to:

- Provide training to employees on ethics, labour rights, and safety
- Participate in capacity-building initiatives to improve compliance

7. Management Systems

Business Partners are expected to maintain management systems appropriate to their size and risk profile to ensure:

- Legal and policy compliance
- Risk identification and mitigation
- Continuous improvement

8. Monitoring, Corrective Actions, and Sanctions

Milan Jewellery may monitor compliance through assessments, audits, or reviews.

Where non-compliance is identified:

- Corrective action plans may be required
- Timelines and follow-up will be defined
- Severe or repeated violations may result in contract termination

9. Roles and Responsibilities

- **Milan Jewellery Employees and Directors** are responsible for implementing this Policy
- **Business Partners** are responsible for compliance and cooperation
- **Management** oversees enforcement and continuous improvement



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SUPPLY CHAIN COMPLIANCE & RESPONSIBLE SOURCING POLICY

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10. Conclusion

This Supply Chain Compliance & Responsible Sourcing Policy (2024) reflects Milan Jewellery's commitment to ethical conduct, responsible sourcing, and sustainable business practices in line with the RJC Code of Practices 2024. Through effective due diligence, collaboration, and continuous improvement, Milan Jewellery aims to strengthen supply chain integrity and contribute positively to the global jewellery industry.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Milan Hediyeelik Eşya Sanayi Ve Ticaret Anonim Şirketi

MİLAN HEDİYELİK EŞYA
SANAYİ VE TİCARET ANONİM ŞİRKETİ
Yenibosna Merkez Mahallesi Kuyumcular Sokak
İstanbul Vizyonpark 4/0204 Bahçelievler/İSTANBUL
Hocapasa V.D. 621 116 9638 Tic. Sic. No: 347275-5
Merists No: 0621 1109 6380 0002

PREPARED AND APPROVED BY MİLAN JEWELLERY BOARD OF DIRECTORS