

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

Kuasar Kuyumculuk (Kurshuni) is committed to operating with integrity, transparency, respect for human rights, and environmental responsibility in all aspects of gold, silver, and diamond jewelry manufacturing, supply chain management, and business activities. In this context, our company has adopted a policy fully aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Annex II Code of Conduct, reflecting international best practices and the principles of responsible sourcing. This policy aims to provide a robust framework to ensure ethical sourcing and responsible business practices throughout our operations.

1. Purpose and Scope of the Policy

This policy establishes a comprehensive framework for identifying, assessing, and mitigating risks associated with the sourcing, procurement, and sale of gold, silver, and diamonds. It covers all of our internal and external operations, including the supply chain, subcontractors, suppliers, business partners, and employees.

2. Compliance with the OECD Due Diligence Guidance

Kuasar Kuyumculuk (Kurshuni) is committed to full compliance with the fundamental principles and step-by-step risk management processes outlined in the OECD Due Diligence Guidance by implementing the following measures:

- **Risk Identification and Management:**
Conducting regular risk assessments across the supply chain, with particular attention to conflict-affected and high-risk areas (CAHRAs).
- **Supplier Vetting and Verification:**
Conducting comprehensive background checks to ensure that suppliers meet international human rights, labor, and environmental standards. Requiring suppliers to provide proof of origin and certification, such as the Kimberley Process for diamonds.
- **Chain of Custody and Traceability:**
Implementing systems that ensure traceability from source to final product, guaranteeing that all materials are conflict-free and ethically sourced.
- **Auditing and Review:**
Conducting regular audits of suppliers, including third-party audits as necessary, to verify ongoing compliance with this policy.

3. Adherence to the OECD Annex II Code of Conduct

Kuasar Kuyumculuk (Kurshuni) fully adheres to the Code of Conduct specified in Annex II of the OECD Due Diligence Guidance and commits not to engage in, support, or facilitate any of the following unethical practices at any stage of the supply chain:

- Serious human rights abuses (forced labor, child labor, torture, inhuman or degrading treatment, mass killings, sexual violence, war crimes, crimes against humanity, or genocide),
- Prevention of armed group financing (not sourcing, processing, or transporting materials from areas controlled by illegal armed groups, and not providing resources to such entities),
- Responsible engagement with public and private security forces (ensuring the protection of facilities and personnel is managed with full respect for human rights and transparency),
- Avoidance of bribery, corruption, money laundering, and tax evasion,
- Risk management and due diligence: Vetting all supply chain actors, identifying risks, and suspending or terminating business relationships in the presence of severe risk.

4. Implementation, Monitoring, and Continuous Improvement

- Corrective Actions and Improvement Plans:
Developing and implementing corrective action plans for any identified risks or noncompliance within the supply chain and engaging with suppliers to remediate adverse impacts.
- Training and Awareness:
Providing training for employees and business partners regarding ethical sourcing, compliance, and policy requirements.
- Recordkeeping, Reporting, and Transparency:
Maintaining detailed records of due diligence processes, audits, and compliance activities. Communicating efforts and progress through annual sustainability and compliance reports.
- Policy Review and Update:
This policy will be reviewed and updated at least annually or as needed to reflect changes in regulations, industry standards, or company operations.

5. Non-Compliance, Sanctions, and Reporting Mechanism

Violations of this policy may result in disciplinary action, including termination of supplier contracts and legal action where applicable.

All employees and stakeholders are encouraged to report suspected violations through established channels. All reports will be handled confidentially, and whistleblowers will be protected against retaliation.

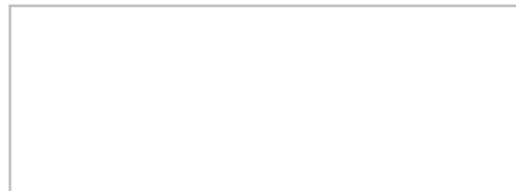
6. Conclusion

This policy demonstrates Kuasar Kuyumculuk (Kurshuni)'s unwavering commitment to international best practices, the OECD Due Diligence Guidance, and Annex II Code of Conduct in ethical, sustainable, and responsible supply chain management. Our company will continue to implement the highest ethical, social, and environmental standards across all operations and remain an example of industry leadership.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Kuasar Kuyumculuk Yapı San. Ve Tic. Ltd. Şti.

(Kurshuni Jewellery)



PREPARED AND APPROVED BY KUASAR KUYUMCULUK (KURSHUNI) BOARD OF DIRECTORS