



# İSTOR KUYUMCULUK SAN. VE TİC. A.Ş. WHISTLEBLOWER POLICY

PL.07 | Yayın Tarihi: 25.08.2023 | R.00 | Revizyon Tarihi: -

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## 1. Introduction

İstor Kuyumculuk San. ve Tic. A.Ş. commits itself to uphold the highest standards of ethical conduct, transparency, and accountability across all its operations, in line with the Responsible Jewellery Council (RJC) and all pertinent legal frameworks. In light of this commitment, we have established a comprehensive whistleblower policy aimed at safeguarding individuals who report any acts of misconduct, corruption, or deviations from established policies or legal obligations. This policy ensures the protection of whistleblowers and facilitates the impartial investigation of reported incidents.

## 2. Scope and Purpose of the Policy

This whistleblower policy applies to all employees, executives, customers, suppliers, and partners associated with İstor Kuyumculuk San. ve Tic. A.Ş. It is designed to provide a secure avenue for the confidential and, if necessary, anonymous reporting of violations, ensuring such reports are thoroughly assessed and addressed with appropriate measures. The policy underscores our dedication to legal compliance, ethical integrity, and the cultivation of a culture rooted in trust and transparency.

## 3. Subjects of Reporting

Whistleblowers are encouraged to report a wide range of concerns, including but not limited to:

- Acts of corruption, bribery, and fraud
- Contraventions of company policies and procedures
- Non-compliance with legal and regulatory frameworks
- Breaches of occupational health and safety protocols
- Environmental protection violations
- Infringements upon human rights and labor laws
- Privacy and data protection issues

## 4. Mechanism and Process of Reporting

İstor Kuyumculuk San. ve Tic. A.Ş. provides various channels for secure and accessible reporting, including a dedicated hotline, email, postal services, or through a secure online platform. Reports can be submitted anonymously, with all reports treated with utmost confidentiality. Each case undergoes an initial assessment, followed by a comprehensive investigation as necessary, guided by principles of transparency, fairness, and timely resolution.

### OUR WHISTLEBLOWER CHANNELS:

- Via e-mail: [compliance@istor.com.tr](mailto:compliance@istor.com.tr)
- Via Web: [istor.com.tr/hotline](http://istor.com.tr/hotline)
- Phone: +90 212 423 94 00

## 5. Protection and Confidentiality

İstor Kuyumculuk San. ve Tic. A.Ş. highly values the protection of whistleblowers' identities and ensures they are safeguarded against any form of retaliation or discrimination. We strictly prohibit retaliatory actions against whistleblowers and pledge to take decisive measures in any case of such violations.

## 6. Continuous Improvement and Training

We are committed to the ongoing evaluation and enhancement of the whistleblower policy's effectiveness and relevance. Furthermore, comprehensive training and awareness programs will be regularly offered to employees to foster ethical behavior, anti-corruption efforts, and understanding of the significance of the whistleblower policy.

## 7. Policy Review and Update

This whistleblower policy will be periodically revisited and updated to remain in alignment with the evolving needs of our company, legal standards, and industry best practices. Ensuring the policy's effective enforcement is a collective responsibility, with all employees expected to be familiar with and abide by its provisions.

### Effective Date: [25/08/2023]

İstor Kuyumculuk San. ve Tic. A.Ş. presents this whistleblower policy as a testament to our commitment to ethical business practices and invites all our employees and stakeholders to play a role in maintaining a transparent and equitable work environment.



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**APPROVED BY THE CEO AND THE BOARD OF DIRECTORS**

**İstor Kuyumculuk San. ve Tic. A.Ş.**



*PREPARED AND APPROVED BY İSTOR KUYUMCULUK BOARD OF DIRECTORS*