ETHICAL POLICY ANA DYLA

ANA DYLA owned and run by the sisters Tekin for over 5 years. We aim to offer jewellery that is well designed and high quality at an honest affordable price whilst maintaining the highest standards of responsible business practice. At ANA DYLA we are committed to the highest standards of ethical conduct and integrity, from the careful choice of whom we work with and how we do business with them, right through to the parcel delivery to the costumer. We are equally committed to following environmental practices that make business sense and best protect the environment.

ANA DYLA is aware of the ethical, moral and environmental impact that surrounds the jewellery supply chain and therefore makes every effort to ensure that they are purchased through approved sources.

Responsible Business Practice

Ana Dyla is aware of the moral and ethical issues that surround the consumables that are used in the manufacture of its products and therefore makes every effort to ensure that they are purchased through approved sources. The suppliers (which include companies for the purchase of gemstones, precious metals) are encouraged and influenced to operate to similar standards.

Ana Dyla directors are committed to integrating ethical, human rights, social and environmental considerations into the day-to-day operations, business planning activities and decision-making processes of ANA DYLA.

We will commit to refraining from any action which contributed to:

- Torture, cruel, inhuman and degrading treatment;
- Forced or compulsory labour:
- Any form of abusive child labour;
- Human rights violations and abuses;
- War crimes, violations of international humanitarian law, crimes against humanity

We are committed to identifying, preventing and mitigating adverse human rights impacts resulting from or caused by our business activities.

ANA DYLA commits to promoting ethical, responsible, human rights, social and environmental practices throughout our business, our employment practices and our business partners including our supply chain. We aim to conduct our business in a manner which is honest and ethical. Ana Dyla makes every effort to work with both its customers and suppliers ensuring that Ana Dyla's expectations and quality standards meet national and international laws and regulations.

External suppliers are visited regularly and audits are conducted to ensure they conform to the ethical requirements and any ethical issues raised are dealt with in a transparent manner so as not to infringe Human Rights and are in compliance with United Nations Resolutions.

Ana Dyla not only takes responsibility for the human rights of its suppliers to Ana Dyla but is mindful of the rights of both its employees and its customers. It makes every effort to ensure these rights are not breached or in conflict with UN legislation and various process and procedures are used to implement and monitor them; these take in both national and international legislation.

As a company we also understand the impact we have on the environment and therefore take every opportunity to reduce this effect by technological innovation; by searching for better ways of doing things; through the use of risk management, to minimize the impact our processes have on the environment; and using the correct recycling and disposal methods for the product and waste we produce.

It is the responsibility of the directors of Ana Dyla to make sure all employees are fully aware of these policies and contribute to making them work as well as continually try to improve these values and where failings occur, bring them to the attention of the management team so that they can be investigated and corrected.

Due Diligence Processes:

As part of our initiative to identify and mitigate risk, we undertake due diligence when taking on new suppliers and regularly review existing suppliers. This includes:

- Where necessary external suppliers are visited and independent audits are conducted to ensure that they confirm the standards.
- We will not deal with, and will immediately discontinue engagement with suppliers where we identify a reasonable risk that they are committing, or are sourcing from or linked to any party committing, abuses described above and who are unable to carry out corrective action.

This underlines our commitment to ensuring that our products are sourced in the most ethical manner possible in a transparent and accountable manner.

We are committed to ensure that our gold, silver and colored gem stones are responsibly sourced because all materials generate different environmental and social impacts.

Our materials are sourced in-line with the requirements of the ANA DYLA Code of Conduct for Partners, covering a wide range of environmental and social criteria.

Company Employment

Ana Dyla is mindful of its rights of employees and customers. It makes every effort to ensure these rights are not breached or in conflict with UN legislation and various process and procedures are used to implement and monitor them. We believe in equality in the workplace and do not discriminate on the basis of race, sex, color, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. We recruit based on qualifications, performance, skills and experience. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply to company employees and any subcontractors and business partners we work with. The whistleblowing policy ensures that all employees know that they can raise concerns without fear of reprisals.

Due Diligence Processes

We utilize a number of methods in order to identify and mitigate risks:

- Ensure employees are treated are treated fairly and with dignity.
- Ensure that we are rigorous in our employment practice, including recruitment
- Have systems in place to identify, mitigate and monitor the risk of slavery and/or human trafficking in our supply chains. This may include registration to, or to follow the principles of, particular operating standards or codes of practice.

Product Disclosure

We commit to providing truthful, reliable and relevant information about all our products. We make clear when items are plated and if stones are natural, synthetic or treated.

Dated 15-01-2020 Updated 10-03-2022

Signed

Hatice Tekin

Sernur Tekin

Directors

CODE OF CONDUCT FOR PARTNERS

We work with our suppliers to improve the sustainability performance of our supply chain through supply chain monitoring and capacity building. We have also developed a Code of Conduct for Partners which we expect our partners to abide by.

ANA DYLA Code of Conduct for Partners places clear expectations on all suppliers and sub-suppliers to follow international UN human rights standards and in-country fair labor practices and laws. By having this code in place, we can help to ensure that our partners and suppliers are addressing important social and labor standards wherever they operate around the world. UN international human rights standards:

https://www.un.org/en/about-us/universal-declaration-of-human-rights Turkish labor laws:

https://iclg.com/practice-areas/employment-and-labour-laws-and-regulations/turkey

RESPONSIBLE SOURCING for ETHICAL GOLD & RECYCLED SILVER

We are committed to demonstrating industry leadership in the responsible sourcing of gold and silver for all collections. As evidence of this, we source the materials from the Borsa Istanbul Precious Metal Lending Market (PMM).

RESPONSIBLE SOURCING for DIAMONDS & COLORED GEMSTONES

ANA DYLA supports and follows the principles for transparency stipulated by the Kimberley Process Certification Scheme. We have put in place a self-regulation initiative for all diamond suppliers, requiring them to refrain from buying or selling conflict diamonds, diamonds from suspect or unknown sources as well as diamonds from countries and regions that have not implemented the Kimberley Process Certification Scheme. Stones not conforming to this scheme are automatically refused and returned to the supplier.

To our knowledge there is not yet a Global Kimberly Process Certification Scheme or similar for colored gem stones, so we ask our suppliers to show proof of purchase and request that they buy colored gemstones for reputable and regulated institutions and suppliers.

Kimberley Process Certification Scheme – Wiki:

https://en.wikipedia.org/wiki/Kimberley_Process_Certification_Scheme Kimberly Process website and video:

https://www.kimberleyprocess.com https://youtu.be/aFqxEJzDIK0

ANA DYLA also works closely with local gemstone sourcing in Turkey where the gemstones are locally sourced (not mined) and locally cut. External suppliers are visited regularly and audits are conducted to ensure they conform to the ethical requirements and any ethical issues raised are dealt with in a transparent manner so as not to infringe Human Rights and are in compliance with United Nations Resolutions.