



For Combating the Laundering of Crime Proceeds, Financing of Terrorism, and Financing the Spread of Weapons of Mass Destruction, Vista Kuyumculuk pledges its commitment to national and international initiatives aimed at thwarting the laundering of crime proceeds, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction (WMD), along with related crimes. As part of our adherence to relevant regulations and corporate duty, we have developed a thorough compliance program within our organization.

Legal Framework

Our compliance program is built in accordance with the following legal frameworks and their associated secondary legislation:

- Law Nr. 5549 on Laundering Prevention of Crime Proceeds
- Law Nr. 6415 on Counter-Terrorist Financing
- Law Nr. 7262 on the Prevention of Financing for the Proliferation of WMD
- Know Your Customer (KYC) Policy and corresponding group procedures in line with international norms

Risk-Based Approach Recognizing that laundering and financing activities can occur in varied forms across distinct sectors, our compliance program adopts a risk-based strategy. This approach aids in pinpointing and evaluating potential laundering risks pertinent to our sector. It lays down the groundwork for setting criteria and implementing effective measures to diminish and oversee these risks.

Implementation Procedures

The fundamental elements of our compliance program include:

- Developing Policies and Procedures: Formulate company policies and procedures that reflect national risk assessments.
- Risk Management: Undertake proactive risk management efforts.
- Monitoring and Control: Apply continuous monitoring and control strategies.
- Compliance Leadership: Nominate a compliance officer and form a specialized compliance team.
- Training: Organize routine training sessions for employees.
- Internal Audits: Perform extensive internal audits.
- Reporting and Documentation: Meet all reporting and documentation retention requirements.
- Customer Due Diligence: Strictly observe KYC norms, encompassing customer due diligence.
- Information Exchange: Support the sharing of account and transaction data within the financial consortium.

Responsibility and Review

The Board of Directors holds ultimate accountability for the effective, sufficient, and correct deployment of the compliance program. It is imperative for all employees to adhere to the program's directives. Our corporate policies and procedures are periodically reviewed to ensure they are up-to-date and communicated efficiently to all staff members.

1. **PURPOSE** This guideline aims to guarantee that Vista Kuyumculuk ("Vista" or the "Company") abides by the regulations concerning "Asset Freezing and the Procedures and Principles for the Revocation of Such Decisions," as part of establishing Regulatory Compliance standards.
2. **RESPONSIBILITY AND AUTHORITY**
 - 2.1 Director General's Responsibility: The Director General is tasked with the execution of this guideline.
 - 2.2 Review and Update: The Director General is charged with the regular review and updating of this guideline to assure its efficacy and regulatory alignment.
 - 2.3 Unit Manager(s) and Employee Compliance: It is the responsibility of the pertinent Unit Manager(s) to ensure all employees are well-informed and comply with this guideline.
3. **APPLICATION** In accordance with the "Procedures and Principles for Asset Freezing and the Revocation of Such Decisions" under the umbrella of fighting terrorism financing and the proliferation of WMDs, the ensuing procedures are applicable:
 - 3.1 Operation Service Review:
 - a) For ongoing precious Vistaal sales, if payment has been made, the precious Vistaals are withheld from delivery to the purchaser. Furthermore, collected amounts, whether cash or credit, are non-refundable.
 - b) For incomplete purchase operations, precious Vistaals that have been handed over but not paid for are not returned to the seller.
 - 3.2 BIST Precious Vistaals and Precious Stones Market Operations: In the case of transactions on the BIST Precious Vistaals and Precious Stones Market, the stock market authorities are promptly notified to immobilize the assets of the concerned parties.



VİSTA KUYUMCULUK SAN. VE TİC. LTD. ŞTİ.
AML – KYC POLICY

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3.3 Ministry Communications: All communications received from the Ministry are answered using the same Vistahod they were received, immediately following the completion of asset freeze operations, and within no more than 7 days.

3.4 Non-Asset or Unregistered Asset Instances: Persons without assets in our custody or whose assets are unregistered are reported to the Ministry with their identification details, highlighting these specifics.

3.5 Asset Record Keepers: Details about the asset freeze for those with registered assets are documented and communicated to the Ministry.

3.6 Instructions for Lifting an Asset Freeze: Upon receiving instructions from the Ministry to lift an asset freeze, the undertaken actions are accordingly reported back to the Ministry.

4. **Effective Date** This instruction is effective as of November 11, 2023, in accordance with the relevant legal provisions.

Q. **ANNEXES**

For Further Clarification

- Annex 1: Regulation Example Used
- Appendix 2: Example of a Communicated Bulletin

Last updated on: 11.11.2023

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Vista Kuyumculuk San. ve Tic. Ltd. Şti.

PREPARED AND APPROVED BY VİSTA KUYUMCULUK BOARD OF DIRECTORS