



VİSTA KUYUMCULUK SAN. VE TİC. LTD. ŞTİ. WHISTLEBLOWER POLICY

PL.07 | Yayın Tarihi: 11.11.2023 | R.00 | Revizyon Tarihi: -

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1. Introduction

Vista Kuyumculuk is dedicated to preserving its leading role in the market while adhering to the highest standards of ethics, openness, and responsibility in every aspect of its operations, in line with the Responsible Jewellery Council (RJC) and all applicable legal guidelines. To this end, our firm has implemented a robust and efficient system for whistleblowing on unethical conduct, corruption, and actions that conflict with policies or legal mandates. This framework aims to safeguard whistleblowers and guarantee that any alleged infractions are thoroughly and impartially examined.

2. Scop and Purpose of the Policy

This whistleblowing policy applies to all employees, executives, clients, vendors, and other partners of Vista Kuyumculuk. It is intended to enable the secure, confidential, and if necessary, anonymous submission of reports on violations, ensuring that such reports are properly assessed and followed up with suitable corrective and preventative measures. This policy underscores the company's dedication to legal, ethical, and industry norms, promoting a culture of integrity and openness.

3. Subjects of Reporting

Whistleblowers can report a wide array of issues, including but not limited to:

- Acts of corruption, bribery, and fraud
- Conduct that breaches company policies and procedures
- Non-adherence to legal and regulatory obligations
- Offenses against occupational health and safety standards
- Infringements on environmental protection norms
- Violations of human rights and labor laws
- Breaches of privacy and data security

4. Mechanism and Process of Reporting

Vista Kuyumculuk provides various Vistahods for secure and straightforward reporting, such as a dedicated hotline, email, postal mail, or a secure online platform. Reports can be submitted anonymously, with all submissions treated with utmost confidentiality. Every report is subject to an initial assessment, followed by a comprehensive investigation as warranted by the severity and specifics of the reported matter, guided by the principles of openness, fairness, and timely response.

OUR WHISTLEBLOWER CHANNELS

Via e-mail: compliance@goldvista.net

Via Web: www.goldvista.net/hotline

Phone: +90 (212) 603 06 37

5. Protection and Confidentiality

The protection of whistleblowers' identities and safeguarding them against retaliation or discrimination is of paramount importance to Vista Kuyumculuk. The company strictly forbids any retaliatory actions against whistleblowers and pledges to take stringent measures in case of such offenses.

6. Continuous Improvement and Training

The organization is committed to regularly evaluating and enhancing the whistleblower policy's efficiency and relevance. Moreover, ongoing training and education programs will be offered to staff members to foster ethical conduct, the fight against corruption, and awareness of the significance of the whistleblowing policy.

7. Policy Review and Update

This whistleblowing policy will be routinely revisited and refined to remain aligned with the company's evolving needs, legal standards, and industry best practices. Ensuring the effective enforcement of this policy is a collective responsibility of the company's leadership, with all employees expected to comprehend and implement the policy.



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Effective Date: [11/11/2023]

Through its whistleblowing policy, Vista Kuyumculuk highlights the value of ethical and accountable business practices, encouraging all employees and stakeholders to contribute to a transparent and equitable workplace environment.

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