



# VİSTA KUYUMCULUK SAN. VE TİC. LTD. ŞTİ. CODE OF ETHICS POLICY

PL.08 | Yayın Tarihi: 11.11.2023 | R.00 | Revizyon Tarihi:-

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**Vista Kuyumculuk San. ve Tic. Ltd. Şti.** is a renowned manufacturer and exporter of fine jewelry, dedicated to maintaining the highest standards of integrity and excellence across all business processes.

## 1.1 Legislation and Compliance

- Vista Kuyumculuk adheres strictly to both national and international regulations pertinent to our operational areas.
- We require all employees to comply scrupulously with applicable legal standards and our internal company policies.
- Employees must be knowledgeable about and understand the legal, regulatory, and internal guidelines applicable to their roles.
- Our compliance department maintains an up-to-date registry of all necessary legal and regulatory requirements, ensuring daily compliance and keeping precise records of such adherence.

## 1.2 Prevention of Financial Crimes

- Given the vulnerability of the jewelry industry to financial crimes, Vista Kuyumculuk prioritizes the identification of potential risks and the implementation of preventative measures against money laundering.
- The company is dedicated to scrutinizing financial transactions and upholding robust internal controls in accordance with national laws and various international guidelines, including:
  - The AML Act by the Turkish Government.
  - The FATF 40 Recommendations and its 8 special recommendations.
- Employees are expected to be familiar with and follow anti-money laundering and financial crime regulations relevant to their duties. Failure to comply or report suspicious activities may lead to disciplinary actions.
- Our compliance officers are diligent in performing due diligence, including KYC & KYS processes, and routinely assess our AML/CFT practices, reporting their findings to management quarterly.

## 1.3 System of Warranties

- Specializing in polished diamonds, Vista Kuyumculuk is committed to meeting all stipulations of the World Diamond Council's System of Warranties Declaration.
- Interactions with any part of the supply chain that deals with conflict diamonds or fails to comply with the System of Warranties Declaration are strictly prohibited.

## 1.4 Anti-Bribery and Anti-Corruption Measures

- Vista Kuyumculuk enforces a zero-tolerance policy towards bribery and facilitation payments throughout its operations.
- The company vehemently prohibits any form of bribery and advocates for transparency and fairness in all business interactions, strictly adhering to both local and international laws.

## 1.5 Transparency in Diamond Trade

- Vista Kuyumculuk champions full disclosure about the characteristics and treatments of diamonds sold, ensuring customers are thoroughly informed about the products they purchase.

## 1.6 Ethical Sourcing Practices

- As a responsible entity, Vista Kuyumculuk commits to ethically sourcing diamonds and gemstones, avoiding any materials from conflict-affected and high-risk areas, and supporting human rights, ethical practices, and environmental stewardship.

## 1.7 Responsible Sourcing of Precious Metals

- The company is dedicated to the environmentally and socially responsible sourcing of gold, silver, and platinum group metals, adhering to stringent ethical sourcing guidelines and legislation.

## 1.8 Supply Chain Integrity

- Vista Kuyumculuk's management ensures that its suppliers and contractors meet the highest international standards of social responsibility, including compliance with the Responsible Jewellery Council (RJC) standards.

## 1.9 Fair Employment Practices

- Vista Kuyumculuk upholds fair labor practices in accordance with national and international laws, ensuring all employees are treated with respect and receive equitable compensation.

## 1.10 Health and Safety Initiatives

- The company commits to maintaining a safe and healthy workplace by implementing policies and practices designed to minimize health and safety risks.



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### 1.11 Equality and Non-Discrimination

- Vista Kuyumculuk fosters a workplace culture free from discrimination, harassment, and any form of coercion, valuing diversity and inclusivity.

### 1.12 Child Labor Prohibition

- In strict compliance with local laws, Vista Kuyumculuk prohibits the employment of individuals under the age of 18 in any of its operations.

### 1.13 Forced Labor Prohibition

- The company ensures that all forms of forced or involuntary labor are strictly prohibited within its facilities.

### 1.14 Human Rights Advocacy

- Vista Kuyumculuk is committed to treating all employees with respect and dignity, safeguarding their rights, and promoting a culture of respect.

### 1.15 Environmental Stewardship

- Vista Kuyumculuk is dedicated to minimizing its environmental impact, complying with environmental regulations, and promoting environmental awareness among its employees and suppliers.

### 1.16 Product Security

- The company ensures the safety and security of its products throughout the supply chain, implementing stringent security measures.

For concerns regarding compliance or ethical conduct, stakeholders are encouraged to reach out. For a copy of our annual sourcing compliance report, please contact [compliance@goldvista.net](mailto:compliance@goldvista.net)

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*