

## **ANTI-MONEY LAUNDERING POLICY STATEMENT - 2021**

Increase in the integration of financial markets at national and international level due to technological advances, growth of money and capital markets, the fact that cash and cash equivalent assets have become transferable between the countries and financial institutions within a short period of time have brought about the risk of utilization of financial institutions by the people attempting to launder proceeds of crime and to finance the terrorism. In addition to international enterprises and regulations developed with the purpose of preventing the utilization of the financial system in money laundering and terrorism financing, various legal regulations in this respect have been developed in our country and great importance has been attached to strengthening the current implementations.

Within this framework, "The Law No.5549 on Prevention of Laundering Proceeds of Crime" was published in Official Gazette No. 26323 dated 18.10.2006, "The Law No. 6415 on the Prevention of the Financing of Terrorism" was published in Official Gazette No.28561 dated 16.02.2013, "The Law No. 7262 on Preventing the Proliferation of Financing Weapons of Mass Destruction" was published in Official Gazette No.31351 dated 31.12.2020 and several regulations in this respect have also been made in sub-legislation and international agreements and regulations to which our country accedes.

In our country, combating against the money laundering and financing of terrorism is being conducted principally by Financial Crimes Investigation Board (FCIB / MASAK) which carries out its' functions within the Ministry of Treasury and Finance.

With the regulations published by FCIB, the banks have become obliged to develop a compliance program with the purpose of prevention of laundering proceeds of crime and financing of terrorism and enabling the required compliance to the related legislation and to set out an institutional policy within the scope of this program by paying attention to the scale of their business, business volumes and the nature of the transactions they conduct.

Our AML/CFT-WMDP and Sanction Policy which has been set out within the above mentioned framework contains the risk management, monitoring and control, training and internal audit policies of Alternatifbank A.Ş. within the scope of prevention of laundering proceeds of crime, financing of terrorism, financing of proliferation of weapons of mass destruction and international sanctions.

The purpose of the AML/CFT-WMDP and Sanction Policy is to enable the compliance of our Bank to the obligations related to prevention of laundering proceeds of crime and financing of terrorism, financing of proliferation of weapons of mass destruction and international sanctions to define the strategies, controls and measurements within the Bank, operational rules and responsibilities by assessing its customers, transactions and services with a risk-based approach as well as raising the awareness of its employees in this respect.

As Alternatifbank A.Ş., we attach importance to combat against laundering proceeds of crime, financing of terrorism, financing of proliferation of weapons of mass destruction and international sanctions beyond compliance to the law and regulations and at the same time we consider this combat as a social responsibility by adopting the fact that the reputation of our Bank in national and international markets is an indispensable element of compliance and integration with these markets.

Alternatifbank A.Ş. takes all the measures necessary to prevent the laundering of the proceeds of crime through our Bank and the utilization of our Bank as a tool for financing terrorism.

We aim to:

- Ensure our Bank's compliance with the legal requirements in connection with the matter
  - Acquire the knowledge about the legal and the administrative duties of our employees.
- Protect the reputation of our Bank and the quality of our customer portfolio.

In order to achieve the foregoing targets, our Bank puts the following policies into practice:

- Our Bank and our Bank's personnel are required to know and to comply with the regulations and the information provided by the governmental and professional institutions participating in the combat with the laundering of the proceeds of crime and the financing of terrorism in national and international level
- Our Bank's personnel are trained to acquire knowledge on their legal and administrative duties regarding the combat with the laundering of the proceeds of crime and the financing of terrorism; and their knowledge is updated regularly;

In the combat against the laundering of the proceeds of crime, our Bank cooperates with principally any and all kinds of entities and institutions, provided that such cooperation is not in violation of the applicable regulations.

In addition to the above, please be informed that you can find Alternatifbank A.Ş.'s US Patriot Certification, Wolfsberg Questionnaire and AML/CFT-WMDP and Sanction Policy on our web site as well.

Thanks and Regards,

Engin TURAN

Internal Control, Legislation and Compliance Department

Head of Internal Control Legislation and Compliance (Money Laundering Reporting Officer)