



TÜRKİYE HALK BANKASI A.Ş.

**GROUP COMPLIANCE POLICY ON ANTI-MONEY LAUNDERING AND
COMBATING THE FINANCING OF TERRORISM**

COMPLIANCE DEPARTMENT

HALKBANK	GROUP COMPLIANCE POLICY ON ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM
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ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM
GROUP COMPLIANCE POLICY

A. INTRODUCTION

Türkiye Halk Bankası A.Ş. and group companies act in full compliance with the national and international laws and other legal regulations in respect of Anti-Money Laundering & Countering the Financing of Terrorism (AML/CFT), Countering the Proliferation of Weapons of Mass Destruction (WMD), prevention of bribing and corruption as well as Sanctions Programs, considering the damage caused by these efforts in social life, within the framework of social responsibility and, attach great importance to this struggle.

B. DEFINITIONS

Auditor: Tax Inspectors, Treasury and Finance Specialists employed at FIU of Türkiye (MASAK), Customs and Trade Inspectors, Sworn-in Bank Auditors, Treasury Comptrollers, Insurance Supervisory Experts and Actuaries, Banking Regulation and Supervision Agency Experts, Capital Markets Board Experts and the Central Bank Auditors and Experts who will carry out audits and investigations within the scope of the Prevention of Laundering Proceeds of Crime legislation.

Asset: Any kind of movable or immovable, tangible or intangible goods or rights which have monetary value, and any kind of legal documents or instruments certifying rights on them.

Bank: Türkiye Halk Bankası A.Ş.

Beneficial Owner: Beneficial owner means natural person(s) who carry out a transaction within an obliged party or who ultimately own(s) or control(s) natural persons, legal persons or unincorporated organizations on whose behalf a transaction is conducted within an obliged party.

Compliance Officer: The officer who is employed for the purpose of ensuring the compliance with obligations established through the Law No. 5549 on Prevention of Laundering Proceeds of Crime or the legislation issued on the basis of the Law and who is entrusted with the required authority.

Customer Profile: Entire information (profile) consisting of information such as occupation, commercial activities, business background, financial status, source of funds, preferred products and services of customer who conducts transactions at the group companies.

Deputy Compliance Officer: The officer to whom the compliance officer may delegate his/her duties and responsibilities entirely or partially by a clear statement in writing, who is meeting the requirements and qualifications for being a Compliance Officer, and assigned exclusively as the personnel of the institution by Board of Directors or authorized Board Members to report to the Compliance Officer.

Deputy Group Compliance Officer: Deputy Compliance Officer of Türkiye Halk Bankası A.Ş.

Financial Institution: Banks, organizations authorized to issue deposit or credit cards out of banks, authorized firms specified in the exchange legislation, finance and factoring companies, capital market intermediary institutions and portfolio management companies, payment or electronic money organizations, insurance, reinsurance and pension funds and insurance and reinsurance brokers, leasing companies, organizations to ensure clearing and maintenance based on the capital market legislation, precious metals intermediaries, crypto asset service providers, Post and Telegraph Organization A.Ş. limited with banking activities.

Freezing of Assets: Removal or restriction of the power of disposition over the asset for the purpose of preventing obliteration, consumption, conversion, transfer, assignation, conveyance and other dispositional actions of the asset.

Fund: Money or property, right, claims of every kind whether movable or immovable, tangible or intangible which could be represented by money and all kinds of documents representing them.

Group Compliance Officer: Compliance Officer of Türkiye Halk Bankası A.Ş.

Group Compliance Unit: Compliance Department of Türkiye Halk Bankası A.Ş.

Halkbank Financial Group: Domestic financial companies and branches of Halkbank Group.

Halkbank Group: Entire domestic and foreign financial companies and their branches that are affiliated to Türkiye Halk Bankası A.Ş. or directly controlled by Türkiye Halk Bankası A.Ş.

International Sanctions: Decisions and regulations issued by international authorities (UN, US, EU, UK) against countries, persons, organizations or vessels for reasons such as laundering proceeds of crime, terrorist activities or anti-democratic practices.

Money Laundering (ML): All kinds of transactions carried out in order to introduce illicit proceeds into the economic system by disguising their origins to leave the impression of that they are obtained in a legitimate way.

Nested Account Activities: The use of a bank's correspondent relationship by a number of underlying banks or financial institutions through their relationships with the correspondent bank's direct customer.

Parent Company: Türkiye Halk Bankası A.Ş.

Payable-Through Accounts: The type of account that is opened in a financial institution located in Türkiye within the scope of correspondent relationship by a financial institution located abroad, and that enables customers of the foreign financial institution to make direct transactions.

Permanent Business Relationship: A business relationship that is established between obliged parties and their customers through services such as opening an account, lending loan, issuing credit cards, safe-deposit boxes, financing, factoring or financial leasing, life insurance and individual pension, and that is permanent due to its characteristics.

Politically Exposed Persons (PEPs): Senior natural persons entrusted with prominent public functions domestically or in a foreign country by election or appointment, and members of the executive board and senior management of international organizations and individuals entrusted with equivalent functions in such organizations.

Risk: The possibility of financial loss or loss of dignity among our group or employees due to use of services for the purpose of ML/FT or not complying completely with the obligations established through the Law or Regulations and Communiqués issued in accordance with the Law.

Financing of Terrorism (FT): Providing or collecting funds for a terrorist or terrorist organizations, even without being associated with a certain act, knowingly and willingly that it will be used in whole or in part for the commission of terrorist crimes.

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Financing of the Proliferation of Mass Destruction Weapons: Activities aimed at financing the transfer and export of nuclear, chemical and biological weapons, which, compared to conventional weapons, cause mass deaths, massive property damage and environmental and health problems that last for many years.

Wire Transfer: Any transaction carried out on behalf of an originator through a financial institution by electronic means with a view to making an amount of funds available to a beneficiary person at a beneficiary financial institution.

C. ABBREVIATIONS

AML/CFT: Anti money laundering and combating financing of terrorism (financing of proliferation of weapons of mass destruction, crimes such as bribery/corruption are also covered)

EU: European Union

FATF: Financial Action Task Force

Group Compliance Policy: T. Halk Bankası A.Ş. Group Compliance Policy Directive on Prevention of Laundering Proceeds of Crime and Financing of Terrorism

MASAK: Financial Crimes Investigation Board

OFAC: US Treasury Department Office of Foreign Assets Control

OFSI: Office of Financial Sanctions Implementation

RoC: Regulation on Program of Compliance with Obligations of Anti Money Laundering and Combating the Financing of Terrorism

RoM: Regulations on Measures Regarding Prevention of Laundering Proceeds of Crime and Financing of Terrorism

UN: United Nations

US: United States

D. OBJECTIVE AND SCOPE

The Group Compliance Policy aims to;

- Ensure Halkbank Group's compliance with legal obligations and international sanctions rules regarding the prevention of laundering proceeds of crime, financing of terrorism/proliferation of weapons of mass destruction, bribery and corruption
- Evaluate customers, transactions and services with a risk-based approach and formulating strategies to minimize risk exposure,
- Determine the controls and measures, operating rules and responsibilities throughout the Group and raising awareness of Halkbank Group employees on these issues,

The standards set out in this policy include the minimum requirements established by the applicable legislation and aim to protect the Halkbank Group, its employees and customers from being exploited in terms of ML/FT.

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Halkbank Group subsidiaries may operate in different sectors and in different countries. The Group Compliance Policy on AML/CFT and the Group compliance program established in accordance with Group Compliance Policy are carried out by Halkbank Group subsidiaries in accordance with the legislation of the country and sector in which they are established.

In the event that the legislation of the relevant country does not allow the implementation of the measures within the scope of the compliance program, the situation is reported to the Bank Compliance Department by the Compliance Officer of the relevant institution together with the legal grounds, and this situation is notified to MASAK by the Bank Compliance Department and additional measures are taken.

E. DUTIES AND RESPONSIBILITIES

Within the scope of Law No. 5549 on Prevention of Laundering Proceeds of Crime, the Bank's Board of Directors is ultimately responsible for ensuring the fulfilment of the obligations that the Group is subject to in the field of "AML/CFT".

The Bank's Compliance Department is responsible for the control and supervision of the implementation of the Group Compliance Policy in the organizations affiliated to Halkbank Group.

The Group Compliance Policy sets a common standard for the policies, procedures and control criteria that Halkbank Group entities must set in writing within the scope of compliance legislation. Halkbank Group entities are responsible for the maximum implementation of this policy to the extent permitted by the legal obligations in their field of activity.

Within the scope of the compliance program, risk management and control processes are carried out by considering the three lines of defense and ensuring coordination between duties/responsibilities of each defense line.

F. LEGAL BASIS

The Law No. 5549 on Prevention of Laundering Proceeds of Crime, the Law No. 6415 on the Prevention of the Financing of Terrorism, the Law No. 7262 on Prevention of the Financing of the Proliferation of Mass Destruction Weapons and the Regulations and Communiqués drawn up on the basis of these laws constitute the legal basis of Group policy on AML/CFT, initially enacted by MASAK. Besides national regulations, the Group also considers the recommendations, principles, standards and guidelines provided by international regulatory bodies and organizations such as FATF as long as they are not incompatible with the national regulations.

G. COMPLIANCE PROGRAM

Group Compliance Policy is the general primary policy, which includes measures to prevent money laundering and financing of terrorism in order to comply with national legislation and international standards and to perform control activities in this context.

The compliance program covers the following measures, which should be considered within the frame of relevant country's or relevant sector's regulations:

- Appointment of a Compliance Officer, at least one Deputy Compliance Officer and establishment of a Compliance Unit,

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- Establishment of policies and procedures for AML/CFT, the drafting of sub-administrative texts for this purpose,
- Providing the necessary information to the personnel in order to raise awareness about the Group and company policies,
- Carrying out risk management activities within scope of AML/CFT to define, rate, monitor, assess and reduce the risks, which the group company may be exposed to,
- Carrying out risk-based monitoring and controlling activities, convenient to the size of the enterprise, business volume and the nature of the transactions it conducts,
- Carrying out training activities within the scope of AML/CFT legislation
- Carrying out internal audit activities in order to ensure the implementation of AML/CFT policies and procedures established within the scope of the Compliance Program.

Reports related with Group Compliance Policy and Halkbank Group companies' compliance policies, are prepared by Compliance Departments and submitted to the member(s) of the Board (which compliance departments attached to) quarterly and to the Board of Directors at least once a year.

Group Compliance Policy is reviewed by Bank's Compliance Department in the scope of legislative changes or in terms of a risk-based approach, updated if it's necessary and submitted for the approval of the Board of Directors.

H. RISK MANAGEMENT

The purpose of the risk management is to ensure that necessary measures are taken to identify, rate, assess, and reduce risks associated with money laundering and terrorist financing that the Group may be exposed.

Halkbank Group companies re-evaluate and update the risk management policy by considering the recommendations, principles, standards and guidelines introduced by national legislation and international organizations based on evolving conditions. Activities performed in this context are regularly reported to the Board of Directors, to the Audit Committee or to the Board Member(s) to whom the Board of Directors has delegated their authority.

Risk management also comprises internal measures and process rules on customer identification and establishes a customer acceptance policy in order to comply with the “**Know Your Customer**” principle in national and international regulations on AML/CFT.

The principles on customer identification specified in the third chapter of the RoM are mentioned in the internal acts of group companies.

Risk Areas: Four risk areas are determined based on the risk-based approach: customer risk, product/service risk, industry risk and country/region risk.

Abuse of group companies by customer or persons acting on behalf of or for the account of customer for the purpose of money laundering or terrorist financing refers to **Customer Risk**.

Non-face-to-face transactions, cash transactions that are difficult to trace, new products to be offered using developing technologies involve **Product and Service Risk** due to their inherent ML/FT risk.

Some industries and business lines pose high ML/FT risks due to excessive use of cash, allowing to disguise the source of funds easily and difficulty to trace such funds, concealing activities' true purposes, thus, customers operating in such high-risk industries constitute **Industry Risk**.

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Money Laundering Countries and regions that do not implement the FATF recommendations or implement them incompletely and therefore designated in FATF's high-risk and increased monitoring lists; countries where comprehensive sanctions/embargoes etc. are applied by UN, EU, USA, United Kingdom and national authorities, countries and regions on drug production-distribution routes (grey areas), where crimes such as smuggling, terrorism, corruption and bribery are widespread and countries/regions called tax havens/off-shore headquarters (off-shore) constitute **Country/Region risk**.

Risk Assessment: Group companies assess customers, products/services, industries, and countries/regions that are in the scope of Bank's business activities and rates them in three distinct categories as below:

- Prohibited / Unacceptable
- High Risk
- Standard Risk

Natural or legal persons listed in **the prohibited/unacceptable risk category** are not accepted as customers and transactions related with them are not executed. The transactions of current customers whose risk category turns to prohibited/unacceptable, are refused and the customer relationship termination process is initiated. Products/services at this level are not offered by our Bank, and business relations with countries/regions at this risk level are not entered into.

Enhanced procedures are applied to the **high-risk** areas.

Standard procedures are applied for **standard-risk** customers and transactions.

I. KNOW YOUR CUSTOMER

Customer Identification and Verification: Group companies are obliged to know natural and legal persons in terms of social, financial and personal information. For this purpose, all necessary measures are taken to obtain all kinds of documents, especially regarding identity information and verify the accuracy of these documents. It is not considered sufficient to obtain the relevant documents once from customers with whom a continuous business relationship is established. Customers are monitored depending on their risk categories, their transactions are checked and changes are taken into consideration.

- Customer accounts have to be opened in the actual name-last name or title of the customer. A customer cannot be accepted under a different name, an anonymous name or a nickname.
- In cases where identification cannot be made or sufficient information cannot be obtained about the purpose of the business relationship; customer acceptance cannot be made and the requested transaction cannot be performed.
- Legal entities whose ownership structure is inexplicably complex and beneficial owner(s) cannot be identified are not accepted as customers.
- In the context of the necessity of customer relations to be based on mutual information exchange, trust and openness, individuals and entities that avoid filling in introductory information forms or provide misleading and unconfirmed information are not considered as customers.
- The names and surnames/titles of the customers are scanned from globally accepted PEPs lists. In the event of a match, necessary measures are taken against PEPs.

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- Requests of third parties to open accounts on behalf of one or more persons (excluding those under guardianship and custody, or minors) are not fulfilled, unless the customer submits relevant legal documents explaining purpose and necessity of opening such an account.
- If any suspicion, information or documentation is figured out as a result of an assessment, suggesting that the assets of a person or entity are not legally acquired, then customer relationship cannot be established with related parties, and assurances or guarantees of them cannot be accepted.
- If there are any doubts about the adequacy and accuracy of existing customer information or if the identification and verification procedure cannot be completed, the customer relationship is terminated.

Definition of Beneficial Owner: Natural person(s) performing transactions at the group companies, natural person on behalf of whom the transaction is conducted, natural person(s) who ultimately control(s) or own(s) legal entities or unincorporated organizations/sole proprietorships are defined as beneficial owners. Accordingly, group companies take necessary measures to detect whether acted on behalf of someone's account/name and identify beneficial owners of transactions.

In establishing a customer relationship with legal entities, group companies identify natural person partners of the legal entity with a share ratio of twenty five percent or more for the identification of the beneficial owner(s).

In case it is suspected that the natural person shareholder of the legal entity holding a twenty five percent or more shares is not the beneficial owner or if the natural person having shares in this percentage does not exist, necessary measures are taken to reveal the natural person(s) who ultimately control the legal entity. The natural person(s) identified are considered to be the beneficial owner. When the beneficial owner is not identified the natural person or persons who are in the highest executive positions registered in the trade registry are considered the beneficial owners.

Necessary measures are taken to detect the natural person or persons who ultimately control the unincorporated organizations. When the beneficial owners cannot be identified, natural person or persons who are in the highest executive positions are considered the beneficial owners.

Transactions Requiring Special Attention: Group companies pay special attention to complex and unusual large transactions and the ones which have no apparent reasonable legitimate and economic purpose, to take necessary measures in order to obtain adequate information on the purpose of the requested transaction, and to keep the information, documents and records.

Monitoring The Customer Profile and The Transactions: Group companies should monitor permanently the transactions conducted by the customers whether they are in compliance with the information regarding the customer's profession, commercial activities, business history, financial status, risk profile and source of funds within the scope of permanent business relationships and keep up-to-date information, documents and records regarding the customer. In cases where it is determined that transactions are carried out that are not in accordance with the purpose of establishing a business relationship and/or customer profile declared during customer acceptance, the customer relationship shall be re-evaluated.

It is continuously monitored whether the accounts opened are actually used by the person in whose name the account is opened.

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Taking Measures Against Technological Risks: Group companies pay special attention to complex and unusually large transactions and transactions that do not have a reasonable legal and economic purpose in sight, and takes necessary measures to obtain sufficient information about the purpose of the requested transaction and to retain the information, documents and records obtained.

Correspondent Relationship: Group companies apply enhanced procedures in establishing and maintaining relationship with correspondent banks. Business relationships cannot be initiated with the shell banks or other banks serving for shell banks. In addition, payable through account and nested account services are not provided.

Wire Transfers: Necessary measures are taken to mitigate risks in wire transfers which enables the cross border or domestic transfer of risky funds.

Mandatory information of the originator and receiver is included in the cross border and domestic wire transfer messages.

Reliable information and documents are obtained from relevant persons in cross border wire transfers related with risky countries and customers.

Simplified Measures: Simplified measures for customer identification and verification can be implemented based on the MASAK General Communique No.5.

Enhanced Measures: One or more of the measures can be applied for high-risk customers and transactions based on RoM, in order to mitigate risks.

J. MONITORING AND CONTROL

It is essential to protect Halkbank Group companies from ML/FT risks and to continuously monitor whether the group activities are performed in accordance with the Law and the regulations and communiqués issued pursuant to the Law and the policies and procedures of the organization. Monitoring and control activities are performed with a risk-based approach considering the size and transaction volume of the group companies.

Compliance Departments of Halkbank Group companies are responsible for monitoring activities for this purpose and keep the risk assessment updated. Compliance Departments establish a centralized monitoring and control system in order to find out ML/FT risks and suspicious activities. The transactions, particularly the ones related with high-risk customers or service/products, are monitored based on the specified criteria and scenarios.

Monitoring and control activities include at least;

- Monitoring and control high-risk customers and transactions,
- Monitoring and control transactions with risky countries,
- Monitoring and control complex and unusual transactions,
- Control whether the transactions that exceed a specified threshold amount are compatible with customer profiles using the sampling method,
- Monitoring and control multiple linked transactions that exceed the threshold amount for customer identification,

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- Completing and updating mandatory information and documents that are subject to record retention and must be kept as hard copy or electronic image and completing mandatory information to be included in wire transfer messages,
- Monitoring transactions continuously whether they comply with the customer profile and source of funds,
- Controlling transactions which are carried out by using systems enabling to conduct non-face-to-face transactions,
- Risk-based controlling services that may become vulnerable to abuse in terms of newly introduced products and technological developments.
- Checking customers and transactions in sanctions lists or blacklists.

Compliance Departments can claim all necessary information and documents from all departments at group companies during the assessment process. Therefore, departments are obliged to present requested information and documents and provide convenience to Compliance Officers/Compliance Departments and authorize them to have access.

K. SUSPICIOUS ACTIVITY REPORT

In case of existence of any information, suspicion or reasonable grounds to suspect that the asset, which is subject to the transactions carried out or attempted to be carried out within or through group, has been acquired through illegal ways or used for illegal purposes and is used, in this scope, for terrorist activities or by terrorist organizations, terrorists or those who finance terrorism, **suspicious activity report** about the person(s) who executed the transaction must be submitted to Financial Intelligence Unit of the relevant country.

Group companies cannot disclose any information that the suspicious activity has been or will be reported to anyone including the parties of the transaction, except for the information provided for the examiners assigned for supervision of obligations and for the courts during legal proceedings.

Pursuant to Article 10 of Law No. 5549, group companies (as legal entities) and their personnel complying with the obligation of reporting suspicious activity, cannot be held responsible judicially and criminally in any way.

L. INTERNAL AUDIT

The purpose of internal audit is to provide assurance to the Board of Directors regarding efficiency and sufficiency of whole compliance program. Group companies ensure, annually and on a risk-based approach, examination and controlling of institutional policy and procedures, risk management, monitoring and controlling activities and whether the training activities are sufficient and efficient, sufficiency and efficiency of risk policy of the group, whether the transactions are carried out in compliance with Law and regulation and communiques issued in accordance with Law and group companies' policies and procedures.

Within the scope of internal audit activities;

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- The deficiencies, mistakes and abuses determined as the result of internal audit, as well as the opinions and proposals for prevention of reappearance of them are reported to the Board of Directors.
- While determining the scope of control, the faults determined during the monitoring and controlling processes and the customers, services and transactions containing risk are included within the scope of control.
- While determining the units and transactions to be audited, it is ensured that units and transactions in quantity and quality that can represent all transactions carried out in the group companies are audited.

These activities are executed by Bank's Board of Inspectors. Information and statistics about internal audit are reported to local Financial Intelligence Unit annually, by each group company based on their legal obligations.

M. TRAINING

The purpose of the training policy related with AML/CFT, is ensuring compliance with obligations imposed by Law and the regulation and communiques issued in accordance with Law, creating an institution culture by increasing the sense of responsibility of staff on policy and procedures of company and on risk-based approach and updating of staff information.

Group companies carry out training activities in compliance with business size, business volumes and changing conditions for AML/CFT.

Group training policy involves training activity processes, personnel who is responsible for conducting activities, determining personnel and trainers to participate in, training of trainers and training methods.

Group companies training policies are executed based on the annual training plans which are approved by the Board of Directors.

All newly hired personnel are trained by Compliance Department expert trainers. Training activities are repeated in certain periods in accordance with the size of the institution, business volumes and changing conditions, in a way to include legislative changes and/or according to the results of training measurement and evaluation. Trainings methods like the online trainings are used besides organizing seminars and panels for conducting training activities. Training result are recorded.

A sufficient number of trainers are determined on this issue in order to ensure that personnel are possessed required knowledge and proficiency. During the selection of trainers, priority is given to those who have attended the trainings organized by MASAK.

Compliance Officer/Compliance Department staff and trainers are encouraged to participate in domestic/international training and seminars in order to specialize in their fields.

Information and statistics on trainings are reported to MASAK annually, based on their legal obligations.

Halkbank Group companies' training program at least covers the following subjects;

- Laundering proceeds of crime and terrorist financing,
- The stages, methods of laundering proceeds of crime and case studies on this subject,
- Legislation regarding prevention of laundering proceeds of crime and terrorist financing,

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- Risk areas,
- Corporate policy and procedures,
- International regulations on combating laundering and financing of terrorism,
- Principles relating to customer identification and verification,
- Principles relating to suspicious activity reporting,
- Obligation of retaining and submitting,
- Obligations on providing information and documents,
- Sanctions to be implemented in violation of obligations.

N. PERIODIC REPORTING

Based on Article 6 of the Law on Prevention of Laundering of Proceeds of Crime, group companies are obligated to report the transactions, to which they are parties or intermediaries, exceeding the amount determined by MASAK.

The types of transactions within the scope of periodic reporting, the manner and time periods for the provision of information, and other procedures and principles regarding the implementation shall be determined by the Ministry of Treasury and Finance. The Ministry may issue guidelines for sending notifications electronically and notifications shall be made in accordance with these guidelines.

Group organizations are responsible for establishing and operating the necessary mechanisms to ensure that the reports requested by MASAK are made quickly and accurately.

O. PROVIDING INFORMATION AND DOCUMENTS:

It is obligatory to provide all kinds of information, documents and records on all kinds of media, including microfilm, magnetic tape, floppy disc, CD and similar media requested by MASAK or auditors, as well as all information and passwords and passwords required to access these records or to make them readable, in full and accurately and to provide the necessary convenience.

Without prejudice to the provisions on the right of defense, information and documents may not be withheld on the grounds of provisions written in special laws.

P. RETENTION AND SUBMISSION OBLIGATION:

Documents in all kinds of media within the scope of the legislation on Prevention of Laundering Proceeds of Crime;

- From the drawn up date,
- From the last entry in books and records,
- From the date of the last processing of identification documents,

Must be kept for a period of ten years and must be submitted to the relevant authorities upon request by the competent authorities.

Documents and records related to internal notifications made to the Compliance Officer, suspicious activity reports and their annexes, written justifications for suspicious activities for which the Compliance Officer has decided not to notify are also within the scope of the retention and submission obligation.

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Q. FINANCIAL SANCTIONS:

Halkbank Group acts in compliance with the sanctions/embargo measures (international financial sanctions) imposed by UN, US, EU and UK to the extent that they do not contradict the legal regulations of the governing country.

In this context, persons, institutions and organizations that are published by the authorities listed below and are completely prohibited from working with or acting as an intermediary in their transactions, as well as persons and organizations under their ownership or control or acting on their behalf shall not be accepted as customers. In the event that existing clients fall within this scope, the client relationship is terminated immediately, without prejudice to national legal regulations.

- UNSC Consolidated Sanctions List
- EU Consolidated Financial Sanctions List
- US - OFAC SDN List
- United Kingdom - OFSI Consolidated List.

R. COMPLIANCE PROCESS AND RESPONSIBILITIES

Halkbank Group entities;

- Establish policies and procedures that include the requirements of national and international regulations regarding AML/CFT by observing the Group Compliance Policy.
- Carry out all business and transactions in accordance with the legislation.
- Carry out their internal policies and procedures in accordance with international obligations, applicable legislation and the provisions of the Group Compliance Policy.
- Establish procedures for ethics and anti-corruption and appropriate channels for employees to report any violations.

In addition, it is ensured that measures are taken for the protection of employees who report and the confidentiality of their whistleblowing reports.

Matters within the scope of the Group Compliance Policy are reported quarterly by the Compliance Units of the organizations to the member of the Board of Directors to whom they report and at least annually to the Board of Directors.

S. HALKBANK FINANCIAL GROUP

Halkbank Financial Group includes domestic financial companies that are affiliated with the Bank or controlled by the Bank and their branches, agencies, representatives, commercial agents, and similar business units **operating in Türkiye**.

It indicates that the financial institution is affiliated with or under the control of the Bank without the condition to own fifty-one percent of their capital, by having majority directly or indirectly, and in addition, possessing preferred shares, and disposing of majority of vote rights pursuant to agreements made with other shareholders, or having the power to appoint or dismiss the majority of members of the Board of Directors in companies under Halkbank Financial Group.

The title, share ownership, control status, and contact information belonging to the parent company and other financial companies within the financial group are notified to the MASAK by the Compliance

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Department at the Bank. In case any financial company participates or leaves the financial group, this case is reported to the MASAK in thirty days from the change date.

Türkiye Wealth Fund is not considered as the parent institution in terms of financial group formation and the financial institutions under Türkiye Wealth Fund are evaluated separately in terms of the institutions with which they are affiliated and in control in formation of the financial group.

Bank Compliance Officer and Deputy are appointed as Financial Group Compliance Officer and Deputy, with suggestion of the Head of Internal Systems Group, consent of the Audit Committee and with the approval of the Board of Directors, in line with the relevant articles of the RoC.

Group Compliance Officer performs the necessary activities to ensure compliance with the regulations at the group level and supervises at Halkbank Financial Group

- to form policies and procedures and perform necessary activities to operate.
- to establish risk management policy and perform necessary activities to operate.
- to establish monitor and control policies
- to share risky cases evaluated in monitor and control activities with the relevant financial institutions under the group
- to establish the information sharing policy and take necessary measures in safe share issues
- to coordinate activities on the training program and to carry out them efficiently.

Compliance Department of the Bank also operates as the Compliance Department of Halkbank Financial Group. The Bank's Board of Directors obtain personnel and resources to the compliance department to ensure that the Parent Financial Group Compliance Officer fulfils his/her duties and responsibilities efficiently considering factors such as the financial size, transaction volume, number of branches and personnel or risk levels of the group that may face.

Additional matters for Halkbank Financial Group determined within the frame of Group Compliance Policy are as follows:

- Halkbank Financial Group companies implement risk areas and risk levels in the Group Compliance Policy. The Group Compliance Officer informs the relevant institutions about details related to sub-titles and their risk level categorization.
- Halkbank Financial Group companies implement monitor and control activities and risky areas defined by the Group Compliance Officer as result of monitor and control activities are reported to the relevant organization and additional measures are applied accordingly.
- Halkbank Financial Group companies carry out the same training obligations specified in the Group Compliance Policy and includes to share secure data into minimal training subjects in the financial group. Group Compliance Officer reports training activities of Halkbank Financial Group to MASAK as well.
- Internal audit activities in Halkbank Financial Group companies are performed by the Bank's Board of Inspectors. Group Compliance Officer also reports internal audit activities to MASAK.

HALKBANK	GROUP COMPLIANCE POLICY ON ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM
	COMPLIANCE DEPARTMENT

T. INFORMATION SHARING POLICY

Information related with customer identification/verification, KYC, customer accounts and customer transactions can be shared within Halkbank Financial Group, in order to ensure that measures included in the compliance program are applied in the group level. Confidentiality provisions written in private laws are not executed in-group information sharing.

Personnel working at Halkbank Financial Group companies cannot disclose information they learn in the scope of information sharing policy and they are not allowed to use it on behalf of themselves or third parties. The personnel who discloses information that must be kept confidential in this context, shall face sanctions mentioned in the Law.

Group Compliance Officer is responsible for taking necessary measures to share information securely in the scope of the information sharing policy. This responsibility also covers other Compliance Officers in the Halkbank Financial Group, Board members, and the Board of Directors of the parent company.

Halkbank Financial Group companies are not allowed to share information on suspicious activities.

U. ENFORCEMENT

- (1) Group Compliance Policy Regulation was approved based on the Resolution of the Board of Directors No. 47/29 dated 21.10.2025 and enters into force on the date when it is accepted by the Board of Directors.
- (2) The provisions of the Group Compliance Policy Regulation are executed by Compliance Department
- (3) Group Compliance Policy Regulation shall be entered into force, updated and implemented with the approval of Türkiye Halk Bankası A.Ş. Board of Directors.
- (4) Board of Directors' approvals of Halkbank Group companies are required for implementing the principles written in this Policy groupwide.
- (5) Based on the approval of this Group Compliance Policy Regulation, the Compliance Policy which was approved based on the Resolution of the Board of Directors No. 34/38 dated 19.09.2023, has been abrogated.