## the Wolfsberg Group

Financial Institution Name: TURK BANKASI LTD.
Location (Country): NORTH CYPRUS

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTIT	Y & OWNERSHIP	一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个一个
1	Full Legal Name	TURK BANKASI LTD.
2	Append a list of foreign branches which are covered by this questionnaire	None
3	Full Legal (Registered) Address	NO:92 GIRNE CADDESI, NICOSIA, N.CYPRUS
4	Full Primary Business Address (if different from above)	NO:92 GIRNE CADDESI, NICOSIA, N.CYPRUS MERSIN 10 TURKEY (for postal purposes only)
5	Date of Entity incorporation/establishment	16/05/1925
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	78% T.Özyol Yatırımları Ltd. 12% Özyol Holding A.Ş.
7	% of the Entity's total shares composed of bearer shares	% 100
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No
10	Name of primary financial regulator/supervisory authority	Cental Bank of Turkish Republic of Northen Cyprus
11	Provide Legal Entity Identifier (LEI) if available	LEI: 78 9000 52VT 5B32 JLVC 70
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	ÖZYOL HOLDING A.Ş.

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13	Jurisdiction of licensing authority and regulator of	TONO (T. J.), D. J.
	ultimate parent	TRNC (Turkish Republic of Northern Cyprus), Banking Regulation and Supervision Agency of Turkey
	38	Tundy
14	Select the business areas applicable to the Entity	*************************************
14 a	Retail Banking	Yes
14 b	Private Banking	Yes
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	No
14 g	Securities Services/Custody	No
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than 10% of its revenue from non-resident customers? (Non-resident means customers primarily resident in a different jurisdiction to the location where bank services are provided)	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
46	0-1-44	
16	Select the closest value:	(2) (1) (1) (1) (1) (1) (1) (1) (1) (1) (1
16 a	Number of employees	51-200
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above	Yes
li de la companya de	Section are representative of all the LE's branches.	100
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PRODI	UCTS & SERVICES	   * 1
19	Does the Entity offer the following products and	THE STATE OF THE S
10	services:	
19 a	Correspondent Banking	No
19 a1	If Y	· 有限的表表的注意。
19 a1a	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1b	Does the Entity allow domestic bank clients to provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
XXXXXXXXX	Does the Entity have processes and procedures in place to identify downstream relationships with	Please select Please select
19 a1d 19 a1e	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?	
19 a1d 19 a1e	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
19 a1d 19 a1e 19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with	Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	Please select Please select Please select
19 a1d 19 a1e 19 a1f 19 a1g	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider	Please select Please select Please select
19 a1d  19 a1d  19 a1e  19 a1f  19 a1f  19 a1h  19 a1h1  19 a1h2	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	Please select Please select Please select Please select



19 m Stored Value Instruments Yes 19 n Trade Finance Yes 19 c Virtual Assets 19 p For each of the following please state whether you offer the service to walk-in customers and if so, the applicable level of due diligence: 19 p1 Check cashing service If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state five applicable level of due diligence If yes, state five applicable level of due diligence If yes, state five applicable level of due diligence If yes, state five applicable level of due diligence If yes, state five applicable level of due diligence.  19 p4 Sale of Monetary Instruments If yes, state five applicable level of due diligence.  19 p5 If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence.  19 p6 If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence.  19 p7 If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence.  19 p6 If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes yes If yes, state the applicable level of due diligence If yes, state the applicable level of due diligence If yes yes If yes, state the applicable level of due diligence If yes yes If yes, state the applicable level of due diligence If yes yes If yes If yes, state the applicable level of due diligence If yes	,		
MSSe AVTSEPSPER  IN Cross-Border Bulk Cash Delivery  10 c Cross-Border Bulk Cash Delivery  10 d Deset Bulk Cash Delivery  10	19 a1i		
19 b Cross-Booter Bulk Crash Dalway 19 c Cross-Booter Bulk Crash Dalway 19 c Cross-Booter Semiliances 19 c Part 19 c			Yes
19 c Crose-Borster Ramitances Ves 19 d Domeste Bulk Cash Delivery 19 d Hold Mall 19 f Instantional Cash Letter 19 g Low Price Securities 19 n Project Procupa Accounting 19 n Project Procupa Accounting 19 n Project Procupa Accounting 19 l Low Price Securities 19 n Project Procupa Accounting 19 l Instantianal Cash Letter 19 l Project Procupa Accounting 19 l Instantianal Cash Letter 19 l Instanti			
19 d Domestic Bulk Cash Delivery No 19 d Homestic Bulk Cash Leder No 19 D Low Price Securities No 19 D Low Price Price Price Price Price Price Price Securities No 19 D Low Price			No
19 a Hold Mall 19 f International Cash Letter 19 g Low Price Securities 19 h Payment services to non-bank entities who may then offer field party payment services to their customers? 19 l Fy Payment services to non-bank entities who may then offer field party payment services to their customers? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py please select all that apply below? 19 l Fy Py			Yes
Section   Personal Content   Personal Content   Personal Content   Personal Accounts   No	-		No
19 g   Low Pirco Securities   No   19 h   Payment services to non-bank entities who may then offer third party payment enviroles to Pair customers?  19 II   If Y, please select all that apply below?  19 II   Third Party Payment Services Providers   Please select   19 II   Third Party Payment Services Providers   Please select   19 II   Third Party Payment Services Providers   Please select   19 II   Third Party Payment Services Providers   Please select   19 II   Commerce Pleations   Please select   19 II   Private Banking   Domestic   19 II   Private Banking   Domestic   19 II   Sponsoring Private ATMs   No   19 II   Sponsoring Private ATMs   No   19 II   Sponsoring Private ATMs   No   19 II   Trade Finance   Yes   19 II   Five select in the service to walk-in customers are off in the service to walk-in customers are off in the service to walk-in customers are off in the service to walk-in customers   19 II   Trade Finance   Yes   19 II   Trade Finance   Trade Finance   Yes   19 II   Trade Finance   Trade Finance   Yes   19 II   Trade Finance   Trad	19 e	Hold Mail	No
Payable Through Accounts   No	19 f	International Cash Letter	No
the offer first party spannet services to form any the offer first party spannet services to form any the castomers?  19 II III F, please select all that apply below?  19 IZ Third Party Payment Service Providers 19 IS Virtual Asset Service Providers 19 IS Virtual Asset Service Providers (ASPs) 19 IS Commerce Platforms 19 IS Commerce Platforms 19 IN Service Providers (ASPs) 19 IN SERVICE PROVIDERS (AS	19 g	Low Price Securities	No
Payment services to non-bank entities who may the one fire third party payment services to their products of the products of the payment services to their products of the payment services to their products of t	19 h	Payable Through Accounts	No
then offer thirty party payment services to their customers?  19 11	19 i	Payment services to non-bank entities who may	
19 12		then offer third party payment services to their	No
1918   Virtual Asset Service Providency (VASPs)   Please select	19 i1	If Y, please select all that apply below?	Green Commence William Commence and Commence
99 Private Banking 191 Private Banking 192 Private Banking 193 Private Banking 194 Remote Deposit Capture (RDC) 195 Remote Deposit Capture (RDC) 196 Remote Deposit Capture (RDC) 197 Remote Deposit Capture (RDC) 197 Remote Deposit Capture (RDC) 198 Remote Deposit Capture (RDC) 199 Remote Deposit Capture (RDC) 199 Remote Deposit Capture (RDC) 190 Remote Deposit C	19 i2	Third Party Payment Service Providers	Please select
19   Private Banking 19   Private Banking 19   Remote Deposit Capture (RDC) 19   Sponsoring Private ATMs 19 m Stord Value Instruments 19 n Trade Finance 19 p T Check cashing search sale whether you offer the service to value instruments 19 p T Check cashing search of use diligence: 19 p T Check cashing search of	19 i3	Virtual Asset Service Providers (VASPs)	Please select
19 J Private Banking Domestic 19 K Remote Deposit Capture (RDC) No 19 K Remote Deposit Capture (RDC) No 19 H Spronsoring Private ATMS No 19 m Shored Value Instruments Yes 19 n Trade The Shored Value Instruments Yes 19 n Trade The Shored Value Instruments Yes 19 n Trade The Shored Yes (Shored Yes American Instruments Yes Applicable level of the diligence of the American Instruments Instru	19 i4	eCommerce Platforms	Please select
19 k Remote Deposit Capture (RDC) 19 l Sponsoring Private ATMA 10 n 19 m Stored Value instruments 19 n Tack Finance 19 n Tack Finance 19 o Virtual Assets 19 p For each of the following please state whether you applicable level of due diligence: 19 p T Chack cashing service 19 p T Part of Theorem Conversion 19 p T Part of Theo	19 i5	Other - Please explain	
19 k Remote Deposit Capture (RDC) 19 l Sponsoring Private ATMA 10 n 19 m Stored Value instruments 19 n Tack Finance 19 n Tack Finance 19 o Virtual Assets 19 p For each of the following please state whether you applicable level of due diligence: 19 p T Chack cashing service 19 p T Part of Theorem Conversion 19 p T Part of Theo		25	
Sponsoring Private ATMs	and the same of th		
19 m   Sicred Value Instruments   Yes	-		102
19 n	19 I	Company of the control of the contro	No
19 p	19 m	Stored Value Instruments	Yes
For each of the following please state whether you offer the service to walk in customers and if so, the applicable level of due diligence:	19 n	Trade Finance	Yes
offer the service to walk-in customers and if so, the applicable level of due diligence   No	19 o	Virtual Assets	No
19 pf   Check cashing service   19 pf   19 pf	19 p	offer the service to walk-in customers and if so, the	
19 p1a   If yes, slate the applicable level of due diligence   19 p2   Wire transfers   19 p2   Wire transfers   19 p3   19 yes, state the applicable level of due diligence   19 p3   Foreign currency conversion   No   No   No   No   No   No   No	10 m1		NO.
19 p2   Wire transfers   No   19 p2a   If yes, state the applicable level of due diligence   Please select   19 p3   Foreign currency conversion   No   19 p4   Sale of Monetary Instruments   Please select   19 p5   If you offer other services to walk in customers   19 p6   If yes, state the applicable level of due diligence   19 p6   If you offer other services to walk in customers   19 p6   If you offer other services to walk in customers   19 p6   Other high-risk products and services identified by the Entity (please specify)   19 q   Other high-risk products and services identified by the Entity (please specify)   20   Confirm that all responses provided in the above   20 a   If N, Carry which questions the difference/s relate to and the branch/es that this applies to.   21   If appropriate, provide any additional information/context to the answers in this section.   21   If appropriate, provide any additional information/context to the answers in this section.   22   Dees the Entity have a programme that sets minimum   AML, CTF at SANCTIONS PROGRAMME   22   Dees the Entity have a programme that sets minimum   AML, CTF at Sanctions standards regarding the following components:   22   Appointed Officer with sufficient experience/expertise   22   Adverse Information Screening   Yes   22   Beneficial Ownership   Yes   22   Cash Reporting   Yes   22   Cash Reporting   Yes   22   Per Screening   Yes   22   Per Jorical Review   Yes   23   Per Jorical Review   Yes   24   Per Jorical Review   Yes   25   Per Jorical Review   Yes   26   Per Jorical Review   Yes   27   Per Jorical Review   Yes   28   Per Jorical Review   Yes   29   Per Jorical Review   Yes   20   Per Jorical Review   Yes   20   Per Jorical Review   Yes   20   Per Jorical Review   Yes   21   Per Jorical Review   Yes	Name and Address of the Owner, when the Owner,		1237
19 p2a			
19 p3   Foreign currency conversion   No   19 p4   Sale of Monotary Instruments   Flease select   19 p4   Sale of Monotary Instruments   Please select   19 p5   If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence   19 p6   Grown of the part			
19 p3a   If yes, state the applicable level of due diligence   Please select   19 p4   Sate of Monetary Instruments   No   19 p4   If yes, state the applicable level of due diligence   19 p5   If yes, state the applicable level of due diligence   19 p5   If yes, state the applicable level of due diligence   19 p6   Other high-risk products and services identified by the Entity (please specify)   19 q   Other high-risk products and services identified by the Entity (please specify)   20   Confirm that all responses provided in the above   20   Section are representative of all the LE's branches.   21   If appropriate, provide any additional			and the state of t
19 p4   Sale of Monetary Instruments   No			
19 p48			
19 p5			
please provide more detail here, including describing the level of due diligence.  19 q Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  AML, CTF & SANCTIONS PROGRAMME  Coes the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Yes  Adverse Information Screening Yes  Adverse Information Screening Yes  C Beneficial Ownership Yes  C CDD Yes  EDD Yes  Independent Testing Yes  Periodic Review Yes  Per Percening Yes  Risk Assessment Yes  Risk Assessment Yes	TOTAL CONTRACTOR OF THE PARTY O		Please select
the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  AML, CTF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Adverse Information Screening Adverse Information Screening Yes  Adverse Information Screening Yes  Cab Reporting Yes  Cab Cash Reporting Yes  Cab Cap CDD Yes  Independent Testing Yes  Independent Testing Yes  Independent Testing Yes  Independent Testing Yes  Per Postreening Yes  Per	19 þ5	please provide more detail here, including	The bank does not offer any services to walk in customers.
Section are representative of all the LE's branches.  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 h Periodic Review Yes  22 l Policies and Procedures Yes  22 j PSe Screening Yes  22 j PSe Screening Yes  22 k Risk Assessment Yes	19 q		None
and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes	20		Yes
information/context to the answers in this section.  3. AML, CTF & SANCTIONS PROGRAMME  22 Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes  22 b Adverse Information Screening Yes  22 c Beneficial Ownership Yes  22 d Cash Reporting Yes  22 e CDD Yes  22 e CDD Yes  22 f EDD Yes  22 g Independent Testing Yes  22 p Periodic Review Yes  22 h Periodic Review Yes  22 i Policies and Procedures Yes  22 j PEP Screening Yes  22 k Risk Assessment Yes	20 a		
Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Yes Adverse Information Screening Yes Beneficial Ownership Yes Cash Reporting Yes Cash Reporting Yes Cap EDD Yes Cap EDD Yes Cap Independent Testing Yes Cap Independent Yes Cap Indep	21		
AML, CTF and Sanctions standards regarding the following components:  22 a Appointed Officer with sufficient experience/expertise Yes 22 b Adverse Information Screening Yes 22 c Beneficial Ownership Yes 22 d Cash Reporting Yes 22 e CDD Yes 22 e CDD Yes 22 e CDD Yes 22 f EDD Yes 22 g Independent Testing Yes 22 h Periodic Review Yes 22 h Periodic Review Yes 22 i Policies and Procedures Yes 22 j PEP Screening Yes 22 k Risk Assessment Yes			
22 b         Adverse Information Screening         Yes           22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22	AML, CTF and Sanctions standards regarding the	
22 c         Beneficial Ownership         Yes           22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 a		Yes
22 d         Cash Reporting         Yes           22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 b		Yes
22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 c	Beneficial Ownership	Yes
22 e         CDD         Yes           22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 d	Cash Reporting	Yes
22 f         EDD         Yes           22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 e		
22 g         Independent Testing         Yes           22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	22 f		
22 h         Periodic Review         Yes           22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	77777		A LONG TO THE RESERVE
22 i         Policies and Procedures         Yes           22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes		1. (1. (1. (1. (1. (1. (1. (1. (1. (1. (	
22 j         PEP Screening         Yes           22 k         Risk Assessment         Yes	350000000000000000000000000000000000000	20 000 000 000 000 000 000 000 000 000	
22 k Risk Assessment Yes	and the same of th	- Life Control of the Control	and the second s
AND THE STATE OF T			
221 Sanctions Yes			Opposition and the second of t
	22 1	Sanctions	Yes

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22 m   Suspicious Activity Reporting   Yes	
22 o Transaction Monitoring Yes  23 How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?  24 Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.  25 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?  26 Does the Entity use third parties to carry out any	
How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?  Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.  Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?  Yes  Yes  To Does the Entity use third parties to carry out any	
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at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.  25 Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?  26 Does the Entity use third parties to carry out any	
regular reporting on the status of the AML, CTF, & Yes Sanctions programme?  26 Does the Entity use third parties to carry out any	
components of its AML, CTF & Sanctions programme?	
26 a If Y, provide further details	
27 Does the entity have a whistleblower policy? No	
Confirm that all responses provided in the above Section are representative of all the LE's branches  Yes	
28 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information/context to the answers in this section.	
4. ANTI BRIBERY & CORRUPTION	: 1 70% 12 70%
Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?  Yes	· · · · · · · · · · · · · · · · · · ·
31 Does the Entity have an enterprise wide programme that sets minimum ABC standards?	
Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	
Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	
34 Is the Entity's ABC programme applicable to: Not Applicable	
	All the second s
Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	
35 b Includes enhanced requirements regarding interaction with public officials?	
35 c Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	
37 Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	
38 Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	
38 a If N, provide the date when the last ABC EWRA was completed.	
Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	
Does the Entity's ABC EWRA cover the inherent risk components detailed below:	9
40 a Potential liability created by intermediaries and other third-party providers as appropriate Yes	

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CBDDQ V1,4

Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes
Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes
Changes in business activities that may materially increase the Entity's corruption risk	No
Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	No
Does the Entity provide mandatory ABC training to:	
Board and senior Committee Management	No
	No
	No
PRODUCTION OF THE PRODUCTION O	No
subject to ABC risk have been outsourced	No
(contractors/consultants)	Yes
to specific roles, responsibilities and activities?	No
Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
If appropriate, provide any additional information/context to the answers in this section.	
TF & SANCTIONS POLICIES & PROCEDURES	: * # # # # # # # # # # # # # # # # # #
Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
Money laundering	Yes
Terrorist financing	Yes
Sanctions violations	Yes
Are the Entity's policies and procedures updated at least annually?	Yes
Has the Entity chosen to compare its policies and procedures against:	
U.S. Standards	No
If Y, does the Entity retain a record of the results?	Not Applicable
A STATE OF THE STA	No
If Y, does the Entity retain a record of the results?	Not Applicable
Prohibit the opening and keeping of anonymous	Yes
Prohibit the opening and keeping of accounts for	Yes
Prohibit dealing with other entities that provide	Yes
Prohibit accounts/relationships with shell banks	Yes
Prohibit dealing with another settle that provide	
Prohibit dealing with another entity that provides services to shell banks	Yes
services to shell banks  Prohibit opening and keeping of accounts for Section 311 designated entities	Yes Yes
services to shell banks  Prohibit opening and keeping of accounts for	
	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials  Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions  Changes in business activities that may materially increase the Entity's corruption risk  Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?  Does the Entity provide mandatory ABC training to: Board and senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific compliance activities subject to ABC risk have been outsourced  Non-employed workers as appropriate (contractors/consultants)  Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?  Confirm that all responses provided in the above Section are representative of all the LE's branches  If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide ABC training that is targeted to and the branch/es that this applies to.  If appropriate, provide any additional information/context to the answers in this section.  If appropriate, provide any additional information/context to the answers in this section.  The SANCTIONS POLICIES & PROCEDURES  Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:  Money laundering  Terrorist financing  Sanctions violations  Are the Entity chosen to compare its policies and procedures against:  U.S. Standards  If Y, does the Entity retain a record of the results?  EU Standards  If Y, does the Entity retain and record of the results?  Prohibit the opening and keeping of anonymous and fictitious named accounts  Prohibit the opening and keeping of accou

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40:		
49 i	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49 1	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	No
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	No
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	Thomas .
53	If appropriate, provide any additional information/context to the answers in this section.	The bank follows Turkish and EU standards.
6 AML C	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the	
54 a	inherent risk components detailed below: Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b 55 c	Customer Due Diligence	
	DED Manuficantan	Yes
	PEP Identification	Yes
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	697
55 d	Transaction Screening Name Screening against Adverse Media/Negative News	Yes Yes
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes
55 d 55 e 55 f	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education	Yes Yes Yes
55 d 55 e 55 f 55 g	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance	Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed	Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h 56	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF	Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h 56 a 57	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client	Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product	Yes Yes Yes Yes Yes Yes Yes Yes Yes
55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 b 57 c	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel	Yes
55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 b 57 c 57 d	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N. provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography	Yes
55 d 55 e 55 f 55 g 55 h 56 a 57 57 a 57 b 57 c	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 b 57 c 57 d 58	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Dilligence	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 b 57 c 57 d 58 58 a 58 b	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months?  If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Dillgence Governance	Yes
55 d 55 e 55 f 55 g 55 h 56 56 a 57 57 a 57 a 57 b 57 c 57 d 58	Transaction Screening Name Screening against Adverse Media/Negative News Training and Education Governance Management Information Has the Entity's AML & CTF EWRA been completed in the last 12 months? If N, provide the date when the last AML & CTF EWRA was completed.  Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Dilligence	Yes

E0 -	Nama Carcanina	To-
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions	
39 a	EWRA was completed.	
60	Confirm that all responses provided in the above	
00	Section are representative of all the LE's branches	Yes
60 a	If N, clarify which questions the difference/s relate to	
•••	and the branch/es that this applies to.	
	2 2 375,725,25	
61	If appropriate, provide any additional	
15/A	information/context to the answers in this section.	
7 KYC I	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	165
(dE)	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
64	Which of the following does the Entity gather and	THE REPORT OF THE PARTY OF THE
HOSES?	retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	<b>的数据</b>
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d	Other relevant parties	No
66	What is the Entity's minimum (lowest) threshold	25%
	applied to beneficial ownership identification?	
67	Does the due diligence process result in customers	Yes
07	receiving a risk classification?	
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	100 C
07 - 4		To the second like the second
67 a1	Product Usage	Yes
67 a2 67 a3	Geography Business Type/Industry	Yes
67 a3	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	Yes
U/ 80	Girler (specify)	
68	For high risk non-individual customers, is a site visit a	
68	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	Please select
68 a4a	If yes, please specify "Other"	ACCES AND
- u - ru	n jour product spacety Caroli	
	Does the Entity have a risk based approach to	
69		Yes
69	Iscreening customers for Adverse Media/Negative	
69	screening customers for Adverse Media/Negative News?	165
1	News?	
69 a	News?  If Y, is this at:	
	Does the Entity have a risk based approach to	Von
69 a	News?  If Y, is this at:	
1	News?	Yes Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	100
71	Adverse Media/Negative News?	Manual
/1	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72 73	What is the method used by the Entity to screen PEPs?	Manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	With the second of the second
74 a1	Less than one year	Yes
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4 74 a5	5 years or more	No .
74 a5	Trigger-based or perpetual monitoring reviews  Other (Please specify)	Yes
75	Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?	
76 a	Arms, defence, military	Prohibited
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	Do not have this category of customer or industry
76 d	Extractive industries	Do not have this category of customer or industry
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	EDD on risk-based approach
76 i	Non-account customers	Do not have this category of customer or industry
76 j	Non-Government Organisations	Always subject to EDD
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Do not have this category of customer or industry
76 m	Payment Service Providers	Do not have this category of customer or industry
76 n	PEPs PEPs	Always subject to EDD
76 o	PEP Close Associates	
	PEP Close Associates PEP Related	Always subject to EDD
76 p		Always subject to EDD
76 q	Precious metals and stones	Always subject to EDD
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	Always subject to EDD
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	Always subject to EDD
76 v	Unregulated charities	Always subject to EDD
76 w	Used Car Dealers	Always subject to EDD
76 x 76 y	Virtual Asset Service Providers Other (specify)	Prohibited  The bank is selling Gold to it's customers.
1)		i i i i i i i i i i i i i i i i i i i
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

Page 8

78 a	If Y indicate who provides the approval:	Sanior husiness management
79	Does the Entity have specific procedures for	Senior business management
	onboarding entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality review on clients subject to EDD?	No
81	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
82	If appropriate, provide any additional information/context to the answers in this section.	
8. MONIT	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
34	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual
84 a	If manual or combination selected, specify what type of transactions are monitored manually	All money transfers and cash transactions above 10,000 EUR are subject to authorisation of Central Ops and subject to monitoring of MLPOS
34 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
34 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Vendor sourced tools (Finexus Paygate analyser and inspector)
34 b2	When was the tool last updated?	<1 year
34 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
35 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
36	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
37	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	No
38	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
19	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes
10	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
10 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to	
1	If appropriate, provide any additional information/context to the answers in this section.	
. PAYME	ENT TRANSPARENCY	And the second of the second o
2	Does the Entity adhere to the Wolfsberg Group	Comment of the Commen
	Payment Transparency Standards?	Yes

Does the Entity have policies, procedures and processes to comply, with an other accordance with:   19			
STA   Local Regulations	93	processes to comply with and have controls in place	
Bit   Local Regulations   Vest   Regulations   Regulations made by Central Back and Local Governerd	93 a	FATF Recommendation 16	Yes
33 c If N. explain  34	93 b	A CONTRACTOR OF THE PROPERTY O	
Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment reseasage?  Does the Entity have controls to support the inclusion of required beneficiary address including country in cross border payment repayments?  Entity Clay Confirm that all responses provided in the above Section are representative of all the LES branches of and the remarks of all the LES branches of and the branchists that this applies to be accounted by the Entity that the applies to the Entity involving with response to the account the properties, provide any additional information/contexts to the answers in this section.  To SANCTIONS  10. SANC	93 b1	If Y, specify the regulation	Regulations made by Central Bank and Local Governent
of required and accurate originator information in cross border payment messages?  Dees the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?  Sa. By Cos the Entity have procedures to include beneficiary address including country in cross border payments?  Section are representative of all the LES branches Sections.  Fig. 18	93 с	If N, explain	
of required beneficiary information cross-border payment mosagages*  15 a	94	of required and accurate originator information in	Yes
beneficiary address including country in cross border payments?  96 Confirm that all responses provided in the above Section are representative of all the LEs branches 96 a If N, darity which questions the difference/is relate to and the branch/les that this applies to,  10. SANCTIONS  97 If appropriate, provide any additional information/localization that any additional information/localization that any additional information/localization that any applicable to the Entity, including with respect to its business conducted with, or through accounts held at to reign financial institutions?  98 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at to reign financial institutions?  99 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in amaner causing the other entity's to-day institution?  100 Does the Entity through problems prohibitions applicable to the other entity (including prohibitions, such as stripping, or the resubmission and or masking, of entitions the control of the account of the applications and controls and the account of the account	95	of required beneficiary information cross-border	Yes
Section are representative of all the LE's branches of the Comment	95 a	beneficiary address including country in cross	Yes
and the branch/es that this applies to.  If appropriate, provide any additional information/bontext to the answers in this section.  10. SANCTIONS  98  Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  99  Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity accounts or services in a manner causing the other entity to violate sanctions prohibitions within the other entity (soluding prohibitions within the other entity (soluding prohibitions) prohibitions within the other entity (soluding prohibitions) applicable to the other entity (soluding prohibitions) applicable to the other entity (soluding prohibitions) applicable and the other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?  101  Does the Entity screen its customers, including beneficial ownership information in cross border transactions?  102 at If automated or both automated and manual selected:  102 at If automated or both automated and manual selected:  103 at If a vendor-accuraced tool or rboth' selected, what is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing dain) of the matching configuration of the automated and manual is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing dain) of the matching configuration of the automated tool's ("Other) please explain in Question 110).  Obsession 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information and management and management and management and managem	96		Yes
information/context to the answers in this section.  10. SANCTIONS  88 Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  99 Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity is accounts or services in a manner causing the other entity to volate sanctions prohibitions applicable to the other entity full-duding prohibitions within the other entity's local jurisdiction)?  100 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?  101 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  102 What is the method used by the Entity for sanctions screening?  103 A life vendor-sourced tool sused?  104 Are internal system of vendor-sourced tools used?  105 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  105 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  106 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  107 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  108 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  109 A life vendor-sourced tool or sourced tools used?  109 A life vendor-sourced tool or both's elected, what is the name of the vendor/bool?  109 A life vendor-sourced tool or sourced tools used?  109 A life vendor-sourced tool or sourced tools used?  109 A life vendor-sourced tool or sourced tools used?  109 A life vendor-sourced tool or	96 a		
Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity is volute sanctions prohibitions applicable to the other entity (including prohibitions within the other entity (including prohibitions applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?  101 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  102 What is the method used by the Entity for sanctions screening?  103 When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated too? (if 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant dats, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Does the Entity screen all sanctions relevant dats, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	97		
In an applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?  Des the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity is accounts or services in a manner causing the other entity (including prohibitions applicable to the other entity (including prohibitions within the other entity including or the result information in cross border transactions?  Does the Entity serven its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  Both Automated and Manual selected:  Are internal system of vendor-sourced tools used?  If a 'wendor-sourced tool' or both' selected, what is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matching) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	10. SANC	TIONS	
controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions applicable sanctions resonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?  101 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  102 What is the method used by the Entity for sanctions screening?  103 If 'automated' or 'both automated and manual' selected:  104 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  105 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  105 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  106 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  107 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  108 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  109 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  109 If a vendor-sourced tool or 'both' selected, what is the name of the vendor/tool?  109 If a vendor-sourced tool or 'both' selected, what is the name of the vendor/tool?  109 If a vendor-sourced tool or 'both' selected, what is the name of the vendor/tool?  109 If a vendor-sourced tool or 'both' selected, what is the name of the vendor/tool?  109 If a vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool' or 'both' selected, what is the name of the vendor/tool'	98	management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held	Yes
controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?  101 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  102 What is the method used by the Entity for sanctions screening?  103 If 'automated' or 'both automated and manual' selected:  104 Are internal system of vendor-sourced tools used?  105 If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  105 When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  106 Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  108 Ves  109 Automated and Manual  109 Both  100 Apygate Inspector based on Dow Jones Index  109 Apygate Inspector based on Dow Jones Index  109 Apygate Inspector based on Dow Jones Index  100 Apygate Inspector based on Dow Jones Index  100 Apygate Inspector based on Dow Jones Index  109 Apygate Inspector based on Dow Jones Index  100 Apygate Inspector based on Dow Jones Index  101 Apygate Inspector based on Dow Jones Index  102 Apygate Inspector based on Dow Jones Index  103 Apygate Inspector based on Dow Jones Index  104 Apygate Inspector based on Dow Jones Index  105 Apygate Inspe	99	controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including	Yes
beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?  What is the method used by the Entity for sanctions screening?  Both Automated and Manual  Both Paygate Inspector based on Dow Jones Index  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	100	controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in	Yes
screening?  If 'automated' or 'both automated and manual' selected:  Are internal system of vendor-sourced tools used? If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Both  Paygate Inspector based on Dow Jones Index  * 1 year  * 1 year  * 1 year  * 2 year  * 3 yes  * 3 yes  * 4 yes  * 3 yes  * 4 yes  * 5 yes  * 5 yes  * 6 yes	101	beneficial ownership information collected by the Entity, during onboarding and regularly thereafter	Yes
selected:  Are internal system of vendor-sourced tools used? If a vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Both  Paygate Inspector based on Dow Jones Index  *1 year  *1 year  *1 year  *1 year  *2 yes	102	[1] [1] [1] [2] [3] [4] [4] [4] [4] [5] [5] [5] [5] [5] [5] [5] [5] [5] [5	Both Automated and Manual
If a Vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?  When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Paygate Inspector based on Dow Jones Index  **Typear**  **Typear**  **Yes**  Yes**		Participation of the second of	一、一个特别的基础。——为为一种的基础的
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true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)  Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?  Yes	102 a1a		Paygate Inspector based on Dow Jones Index
including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	102 a2	true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in	<1 year
104 What is the method used by the Entity? Combination of automated and manual	103	including at a minimum, entity and location information, contained in cross border transactions	Yes
A CONTRACTOR OF THE CONTRACTOR	104	What is the method used by the Entity?	Combination of automated and manual

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105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data)
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data)
106 с	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners (i.e. reference data)
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data)
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)
106 f	Other (specify)	Dow Jones Index
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Within 3 to 5 business days
108	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to,	
110	If appropriate, provide any additional information/context to the answers in this section.	
	NG & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b 112 c	1st Line of Defence 2nd Line of Defence	Yes
112 c	3rd Line of Defence	Yes Yes
112 u	Third parties to which specific FCC activities have	A CONTO
75105 (0700)	been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Yes
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above Section are representative of all the LE's branches	Yes
		Yes

## Standard which questions the differences relates to and the branchives that this applies to.  ## If appropriate, provide any additional intermediculororibat to the answers in this section, section of the program with or its based Quality Assurance programs with or its based Programs of the Programs of the Programs with or its based Programs of the Program			
Information/context to the answers in this section.	115 a		
117 Does the Entity have a program wide risk based Qualty Assurance programs for framinal action (separate form the Independent Audit Incrion)?  118 Does the Entity have aprogram wide risk based Compliance Testing process (separate from the independent Audit Incrion)?  119 Confirm that all responses provided in the above Section are representable of all the LES branches  119 a. If N, darify which questions the difference's relate to and the branchies that this applies to.  110 If appropriate, provide any additional information-tontext to the answers in this section.  121 In addition to inspections by the government supervisor-foreglablotis, does the Entity have an approximate on a regular body that any applications and practices on a regular body and practices on a regular body and practices on a regular body against provident third party to both, that assessment PC Found and Sandrons popularies and practices on a regular body against provident third party obove the following practices are provided any additional information-tontext to the answers in this section.  122 A. Internal Audit Department  123 Dees the internal audit succion or other independent third party cover the following areas:  123 A. M.C. CTF. ABC, Fraud and Sanctions policy and procedures  124 Provident in the Sanction of the Internal Audit Succion or other independent third party cover the following areas:  123 B. Enterprise Wide Risk Assessment  124 Yes  125 Description of the Sanction of the Internal Audit Succion or other independent third party cover the following areas:  126 A. W.C. COD EDD and underlying methodologies  127 A. Reporting Metrics & Management Information  128 Yes  129 Transaction Screening Including for sanctions  129 Yes  120 Transaction Screening Including for sanctions  120 Transaction Menings from internal & external audit Included to conditions and the Public Process of all the LEP branches  128 A. Franching & Goustion of all the LEP branches  129 Transaction Screening including for sanctions and the provided and the	116		
Quality Assurance programme for financial crime (expenses from the independent Audit function)?	12. QUALI	TY ASSURANCE /COMPLIANCE TESTING	1.7.100000 (California)
Gesparate from the Independent Audit function]?   118   11	117	Does the Entity have a program wide risk based	C = //April (State (CC) - CC) (C. )
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information/context to the answers in this section.    13. AUDIT	119 a		
In addition to inspections by the government supervisorsfrequalists, does the Entity have an internal audit function, a testing function or other independent intire plant, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?  122 How often is the Entity audited on its AML, CTF, ABC, Fraud and Sanctions programme by the following:  122 a Internal Audit Department Yearly  123 b External Third Party  Component-based reviews  123 a AML, CTF, ABC, Fraud and Sanctions policy and procedures  123 a Part of the Party American Sanctions policy and procedures  123 b Enterprise Wide Risk Assessment Yes  123 c Governance  123 d KYC/CDDEDD and underlying methodologies Yes  123 e Reporting/Metrics & Management Information Yes  123 f Reporting/Metrics & Management Information Yes  123 g Suspicious Actify Filing Yes  123 g Suspicious Actify Filing  123 g Transaction Monitoring Yes  123 g Transaction Screening including for sanctions  123 g Transaction Screening including for sanctions  123 g Are adverse findings from internal & external audit tracked to completeness or presentative of all the LES branches  124 Are adverse findings from internal & external audit tracked to completeness or presentative of all the LES branches  125 a If No. Larry Wide Risk applies to.  126 If appropriate, provide any additional information/context to the answers in this section.	120		
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Fraud and Sanctions programme by the following:  122 a Internal Audit Department  123 b External Third Party  Component-based reviews  123 c Does the internal audit function or other independent third party cover the following areas:  123 a AML_CTF_ABC, Fraud and Sanctions policy and procedures  123 b Enterprise Wide Risk Assessment  125 c Governance  126 Ves  127 Name Screening & List Management  128 c Name Screening & List Management  129 c Reporting/Metrics & Management Information  120 yes  121 c Reporting/Metrics & Management Information  122 r Reporting/Metrics & Management Information  123 d KYC/CDD/EDD and underlying methodologies  123 d Reporting/Metrics & Management Information  124 resolution Monitoring  125 ves  126 Transaction Monitoring  127 Transaction Screening including for sanctions  128 d Training & Education  129 Ves  129 Transaction Screening including for sanctions  120 Other (specify)  121 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  128 d If Appropriate, provide any additional information/context to the answers in this section, information/context to the answers in this section, information/context to the answers in this section, information/context to the answers in place addressing fraud risk?  129 Does the Entity have a dedicated team responsible		supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and	Yes
122 b External Third Party Does the internal audit function or other independent third party cover the following areas:  123 a AML_CTF, ABC, Fraud and Sanctions policy and procedures  123 b Enterprise Wide Risk Assessment Yes  123 c Governance Yes  123 c Reporting/Metrics & Management Yes  123 d KYC/CD/EDD and underlying methodologies Yes  123 e Name Screening & List Management Yes  123 f Reporting/Metrics & Management Information Yes  123 g Suspicious Activity Filling Yes  123 h Technology Yes  123 h Technology Yes  123 i Transaction Monitoring Yes  123 i Transaction Screening including for sanctions Yes  123 i Transaction Screening including for sanctions Yes  123 i Other (specify)  124 Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?  125 Confirm that all responses provided in the above section are representative of all the LE's branches  125 a If N, clarify which questions the difference/s relate to and the branch/es that this applies to.  126 If appropriate, provide any additional information/context to the answers in this section.  127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	122		
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127 Does the Entity have policies in place addressing fraud risk?  128 Does the Entity have a dedicated team responsible	14. FRAU	Distriction	The state of the s
	127	Does the Entity have policies in place addressing fraud risk?	Yes
The Control of the	128	Does the Entity have a dedicated team responsible for preventing & detecting fraud?	Yes

Page 12 CBDDQ V1.4

## Wolfsberg Group Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4

130		
2002	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	If appropriate, provide any additional information/context to the answers in this section.	

## **Declaration Statement** Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent) TURK BANKASI LTD. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards. The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months. The Financial Institution commits to file accurate supplemental information on a timely basis. ZEHRA TAMAKAN (Global Head of Correspondent Banking or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial SERCAL OKUR (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution. (Signature & Date)