



AHLATCI KUYUMCULUK SAN.VE TİC. A.Ş.
Institutional Policy on Anti-Money Laundering and Countering of Terrorist Financing

Prepared	Controlling	Approver	Approval date
Bekir HANÇERLİ Compliance Officer	Ahmet Emin AHLATCI CEO	Ahmet AHLATCI Chairman of the Board	31 JANUARY 2025

1. PURPOSE AND SCOPE

Ahlatcı Kuyumculuk San.ve Tic.A.Ş. Determination of duties, authorities and responsibilities within the framework of the legal regulations regarding Anti-Money Laundering and Countering of Terrorist Financing, the Law No. 5549 on the "Prevention of the Proceeds of Crime" and the "Law on the Prevention of the Financing of Terrorism" No. 6415, a risk-based management of customers, transactions and services. It has been prepared with the aim of determining the strategies, internal controls and measures, operating rules and responsibilities for reducing the risk that the group may be exposed to, and raising awareness of the group employees on these issues.

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Corporate policy Ahlatcı Kuyumculuk San.ve Tic.A.Ş.It covers the policy documents and application principles that must be followed for its employees. In this context, it is aimed to fully comply with the relevant legal regulations.

The scope of our institution's compliance program; Establishing corporate policy and procedures , Carrying out risk management activities, Carrying out monitoring and control activities, Appointing a compliance officer and assistant and establishing a compliance unit, Carrying out educational activities, It also includes measures regarding the execution of internal audit activities, the identification of the customer, and the establishment of policies and procedures for the secure sharing of account and transaction information within the group.

Within the scope of the harmonization program, the measures in the first and third paragraphs will be reviewed at least every two years and necessary updates will be made.

2. BASE

The regulations that form the basis for the preparation of this policy are listed below.

- * Law No. 5549 on the Prevention of Money Laundering of Proceeds of Crime,
- * Law No. 6415 on the Prevention of Financing of Terrorism,
- * Law No. 7262 on the Prevention of Financing the Proliferation of Weapons of Mass Destruction
- * Regulations and communiqués published based on the specified laws.

3. DEFINITIONS

Ministry: TR Ministry of Treasury and Finance,

Presidency: Financial Crimes Investigation Board (MASAK),

FATF: Financial Action Task Force, Financial Action Task Force,

Law No. 5549: Law on the Prevention of Laundering of Proceeds of Crime dated 11/10/2006, published in the Official Gazette dated 18/10/2006 and numbered 26323

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Law No. 6415: Law on the Prevention of Financing of Terrorism dated 07/02/2013, published in the Official Gazette dated 16/02/2013 and numbered 28561

Law No. 7262: Law on the Prevention of Financing of Weapons of Mass Destruction, which entered into force after being published in the Official Gazette dated 31/12/2020 and numbered 31351

Regulation on Measures: Regulation on Measures Regarding the Prevention of Laundering Proceeds of Crime and Financing of Terrorism, published in the Official Gazette dated 09/01/2008 and numbered 26751

Legislation: Laws, Regulations and Communiqués in force and MASAK decisions and instructions regarding the prevention of laundering proceeds of crime and financing of terrorism,

Financial Group: Ahlatci Holding AS Financial Group consisting of companies that meet the conditions specified in the Legislation.

Internal Control Unit: The Internal Control Unit, the unit operating under the coordination of MASAK Compliance Officer in fulfilling the duties and responsibilities within the scope of the Compliance Program,

Training Unit: The Training Unit is the unit operating under the supervision and coordination of the MASAK Compliance Officer for the fulfillment of the duties and responsibilities within the scope of the Compliance Program .

Compliance Unit: The unit consisting of employees working under the Compliance Officer and responsible for the execution of the compliance program,

Compliance Program: The whole of the measures to be formed for the prevention of laundering proceeds of crime and financing of terrorism, the scope of which is determined in Article 5,

Compliance Officer and Assistant Compliance Officer: Personnel appointed by the Board of Directors and equipped with the necessary authority in order to ensure compliance with the obligations arising from the Law No. 5549 and 6415 and the legislation enacted based on the Law,

Employee / personnel / staff: Personnel at all levels and positions, who work permanently or temporarily in the Financial Group,

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Risk: The possibility of financial or reputational damage that the obliged parties or their employees may be exposed to due to the reasons such as benefiting from the services provided by the obliged parties for the purpose of laundering the proceeds of crime or financing of terrorism or the obligators not fully complying with the obligations imposed by the Law and the regulations and communiqué issued in accordance with the Law,

Country risk: Obligated; The risk that those announced by the Ministry from countries that do not have adequate regulations on the prevention of money laundering and terrorist financing, do not cooperate adequately in the fight against these crimes or are considered risky by authorized international organizations, due to their business relations and transactions with their citizens, companies and financial institutions,

Customer risk: The customer's line of business allows for heavy use of cash, trading of high-value goods or easy international fund transfers; The risk of abuse of the obligatory due to the fact that the customer or those acting on behalf of or on behalf of the customer act for the purpose of laundering the proceeds of crime or financing terrorism ,
It expresses.

4. DUTIES, AUTHORITIES and RESPONSIBILITIES

Board of Directors: The board of directors is ultimately responsible for the efficient and effective execution of all compliance policies in accordance with the scope and characteristics of the Company's activities.

Board of Directors; To appoint compliance officer and assistant compliance officer, to clearly define the authorities and responsibilities of the compliance officer, to approve corporate policies, annual training programs and changes to be made in these according to developments, to evaluate the results of risk management, monitoring and control and internal audit activities carried out within the scope of compliance policy, It is authorized and responsible for taking the necessary measures to correct the errors and deficiencies in a timely manner and to ensure that all activities within the scope of the compliance policy are carried out effectively and in coordination.

Risk management, monitoring and control activities within the scope of the compliance program are carried out by the compliance officer under the supervision, supervision and responsibility of the board of directors.

Employees of the Institution may not engage in any transactions or actions that would be deemed to be laundering proceeds of crime or that would facilitate these activities. For this purpose, employees; Within the framework of the know-your-customer principles, it has to show the necessary attention and care against the possibility of money laundering in its relations with the customer. Otherwise, they may face legal sanctions ranging from fines to imprisonment as per the relevant law. Institution

employees; It is responsible for participating in the training activities to be organized on the subject, acting within the framework of the principles of knowing your customer while performing its duties, and reporting any suspicious transactions they may encounter to the compliance officer.

5. POLICY REGARDING CUSTOMER KNOWLEDGE, SECURE SHARING OF INFORMATION ABOUT ACCOUNT AND TRANSACTIONS WITHIN GROUP

In Article 3/1 of the Law No. 5549, "Obliged parties, within the scope of the principles regarding the recognition of the customer; Before taking any action in the transactions made by them or mediated by them, they are obliged to determine the identities of those who make transactions and those who are transacted on their behalf or on their accounts, and take other necessary measures." provision is included.

6 to 14 of the Measures Regulation , identification of; For real persons, legal persons registered in the trade registry, associations and foundations, trade unions and confederations, political parties, legal entities residing abroad, organizations without legal personality, public institutions and persons acting on behalf of others, the procedure to be done is stated . Mining Authorized Institutions Inc. and its employees are responsible for taking action in accordance with the relevant regulations . More; It is responsible for taking action in accordance with the Tightened Measures within the scope of the Customer Recognition Principle determined by the Financial Crimes Investigation Board of the Ministry of Treasury and Finance.

Intra-institutional information sharing within the scope of the Compliance Program;

* The Institution may share information regarding accounts and transactions with the recognition of the customer in order to take the measures within the scope of the compliance program . Confidentiality provisions written in special laws do not apply to in-group information sharing.

* Those working in the institution cannot disclose the information they have learned within the scope of the first paragraph and cannot use it for the benefit of themselves or third parties. In this context, sanctions in the relevant laws are applied to those who disclose information that should be kept confidential.

* The board of directors of the main financial institution, together with the financial group compliance officer, is responsible for taking the necessary measures for the secure sharing of information within the institution. This responsibility also applies to the compliance officers of the financial institutions affiliated to the group and the boards of directors of these institutions.

* The Institution cannot share information regarding suspicious transaction reporting.

6. RISK MANAGEMENT POLICY

The institution creates a risk management policy by considering the size of the business, the volume of business and the nature of the transactions they perform. the purpose of the risk management policy; It is to identify, rank, monitor, evaluate and reduce the risks that the obligor may be exposed to, and includes the following subjects.

* Developing risk identification, rating, classification and evaluation methods based on customer risk, service risk and country risk,

* Rating and classification of services, transactions and customers according to risks,

* Ensuring the monitoring and control of risky customers, transactions or services, taking necessary measures to reduce risks; reporting in a way that warns the relevant units; Developing appropriate operating and control rules for the execution of the transaction with the approval of the higher authority and its supervision when necessary,

* Questioning the consistency and effectiveness of risk identification and assessment methods, risk rating and classification methods retrospectively through case studies or realized transactions, re-evaluating and updating them according to the results and developing conditions,

* Carrying out necessary development studies by following the recommendations, principles, standards and guides brought by national legislation and international organizations regarding the subjects within the scope of risk,

* Reporting the results of risk monitoring and evaluation to the board of directors at regular intervals,
its activities .

Additional measures for high-risk groups

applies one or more or all of the following measures in proportion to the identified risk, in order to reduce the risk to be should be done for the groups they have determined as high risk as a result of the risk rating ;

* Obtaining additional information about the client and updating the identity information of the client and beneficiary more frequently,

* To obtain additional information about the nature of the business relationship,

* Obtaining as much information as possible about the source of the assets subject to the transaction and the funds belonging to the customer,

- * To obtain information about the purpose of the transaction,
- * To enter into a business relationship, to continue the current business relationship or to make the transaction depend on the approval of the senior official,
- * Keeping the business relationship under strict surveillance by increasing the number and frequency of the controls applied and identifying the types of transactions that require additional control,
- * To require the first financial transaction to be made from another financial institution where the principles of customer recognition are applied in the establishment of a permanent business relationship.
- * The Ministry is authorized to determine additionally tightened measures, apart from the high-risk situations to be considered within the scope of this article and those listed in the first paragraph.

The Principles for Knowing the Customer are determined by the "Know Your Customer procedures" prepared by the Compliance Officer and the responsible manager with the participation of the relevant units.

Appropriate processes and systems are determined by the "Risk Management Procedure" prepared by the Compliance Officer and the responsible manager in order to define, rank, evaluate and reduce the customer, service, country and national risks that may be exposed.

the property subject to the transaction made or attempted to be carried out before or through the obliged parties; Detection of suspicious transactions, and reporting principles are determined by the "Suspicious Transaction Detection and Notification Procedure" prepared by the Compliance Officer.

7. MONITORING AND CONTROL POLICY

the purpose of the monitoring and control policy created for the institution; is to protect the institution from risks and to constantly monitor and control whether its activities are carried out in accordance with the Law and the regulations and communiqués issued in accordance with the Law, as well as the institution's policies and procedures . Processes and systems suitable for this purpose are prepared by the Compliance Officer and the responsible manager with the "Monitoring and Control Procedure".

Monitoring and control activities;

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- * Monitoring and control of high-risk customers and transactions,
- * Monitoring and control of transactions with risky countries,
- * Monitoring and control of complex and unusual transactions,
- * Checking by sampling method whether the transactions over an amount to be determined by the obligor according to the risk policy are compatible with the customer profile ,
- * Monitoring and controlling related transactions exceeding the amount that requires identification when taken together,
- * Checking the information and documents about the customers that must be kept electronically or in writing, and the information that must be included in the electronic transfer messages, and completing the deficiencies and updating them,
- * The transaction carried out by the customer; Continuous monitoring throughout the business relationship whether the customer is in compliance with the information on his business, risk profile and funding sources,
- * Control of transactions carried out using systems that enable non-face-to-face transactions,
- * It covers the activities of risk-based control of services that may be exposed to abuse due to newly introduced products and technological developments .

Obliged parties carry out monitoring and control activities within the scope of corporate policy, taking into account the size of the business, business volumes and the nature of the transactions they perform.

8. COMPLIANCE OFFICER and COMPLIANCE UNIT

Compliance Officer is the person employed and endowed with the necessary authority to ensure compliance with the obligations brought by the Law and the legislation enacted on the basis of the Law. It is responsible for performing all the work and transactions that the legal regulations impose on the compliance officer and other duties assigned by the Board of Directors or the member(s) assigned by the Board of Directors.

The duties, powers and responsibilities of compliance officers are as follows:

- * To carry out the necessary studies in order to ensure compliance with the Law and the regulations enacted pursuant to the Law, and to ensure the necessary communication and coordination with the Presidency,
- * Creating the corporate policy and procedures and submitting the corporate policies to the approval of the board of directors,
- * Creating risk management policy, carrying out risk management activities,
- * To establish monitoring and control policies and to carry out related activities,
- * To present the studies on the training program for the prevention of money laundering and financing of terrorism to the approval of the board of directors and to ensure the effective implementation of the approved training program,
- * Evaluating the information and findings obtained by researching within the limits of his/her authority and possibilities regarding the suspicious transactions communicated to him or learned ex officio, and notifying the Presidency of the transactions he/she decides to be suspicious,
- * To take the necessary measures to ensure the confidentiality of notifications and other related issues,
- * To request all kinds of information and documents required within the scope of the evaluation of suspicious transactions from all units within the obligee,
- * To keep information and statistics on internal audit and training activities regularly and to send them to the Presidency within the periods specified in the Regulation.
- * Within the scope of ensuring the necessary communication and coordination with the Presidency; The obligation of the company to provide information and documents to the Presidency is fulfilled through the compliance officer. The obliged party, from whom information and documents are requested, must submit the said information and documents in accordance with the format and method determined and notified to him by the Presidency.
- * The compliance officer must act in good faith, in a reasonable and honest manner, with an impartial and independent will while performing his duties and responsibilities.

* The board of directors ensures that the compliance officer has the authority to make decisions with an independent will, to request all kinds of information and documents related to his/her field of duty from all units within the responsible body, and to access them in a timely manner.

Compliance Unit; It refers to the unit consisting of employees working under the compliance officer and responsible for the execution of the compliance program.

In order to ensure that the compliance officer of the Board of Directors can effectively fulfill his duties and responsibilities brought by this Regulation, the compliance officer, who is directly connected to the compliance officer and is responsible for the execution of the compliance program, takes into account the factors such as the size of the business, the transaction volume, the number of branches and personnel or the height of the risks he may face. It ensures the formation of the unit and the allocation of sufficient personnel and resources to the compliance unit.

personnel who will work in the compliance unit can take part in the process of evaluating internal reports that may be the subject of suspicious transactions in the light of the Law and the regulations and communiqués issued pursuant to the Law, as well as other information, but cannot decide whether the transaction should be reported to the Presidency as a suspicious transaction or not directly report suspicious transactions to the Presidency. Since the internal notifications made to the compliance officer within the scope of suspicious transactions are also within the scope of confidentiality, the necessary measures are taken by the board of directors and the compliance officer to ensure that the personnel do not violate this obligation.

Appointment of corporate compliance officer and compliance unit;

* The Agency determines the compliance officer of the main financial institution as the financial group compliance officer in order to carry out the compliance program at the Institution level. The assistant compliance officer of the main financial institution is determined as the assistant financial group compliance officer. The institution compliance officer and assistant are appointed to report to the board of directors of the financial institution or to one or more members to whom the board of directors has delegated its authority, and paragraphs three to five of Article 16 are applied regarding the appointment.

* The duties and responsibilities of the corporate compliance officer are as follows:

* To carry out the necessary studies in order to ensure the compliance of the Institution with the Law and the regulations enacted pursuant to the Law at the group level, and to ensure the necessary communication and coordination with the Presidency.

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- * Creating the policies and procedures of the institution and presenting the policies of the group to the approval of the board of directors.
- * To create the risk management policy of the institution, to carry out risk management activities.
- * To establish the monitoring and control policies of the institution and to carry out activities related to this.
- * To share the matters that are considered to be risky as a result of risk management, monitoring and control activities with the relevant financial institution within the group.
- * To establish the information sharing policy of the institution and to take the necessary measures regarding the safe sharing of this information within the group.
- * Coordinating the training programs of financial institutions affiliated with the group in order to prevent laundering proceeds of crime and financing of terrorism and overseeing the effective implementation of training programs.
- * Acts as the compliance unit of the parent financial institution and as the compliance unit of the financial group. The board of directors of the main financial institution, in order to ensure that the financial group compliance officer can effectively fulfill his duties and responsibilities brought by this Regulation, taking into account the factors such as the financial size of the group, transaction volume, number of branches and personnel or the height of the risks it may face, sufficient personnel and resources are provided to the compliance unit. allows allocation.

Financial information sharing within the group within the scope of the Compliance Program;

- * Organizations affiliated to the group may share information regarding accounts and transactions, with the recognition of the customer, in order to ensure that the measures within the scope of the compliance program are taken at the group level. Confidentiality provisions written in special laws do not apply to in-group information sharing.
- * Those working in organizations affiliated with the Group cannot disclose the information they have learned under the first paragraph and cannot use it for their own benefit or for the benefit of third parties. In this context, sanctions in the relevant laws are applied to those who disclose information that should be kept confidential.
- * The board of directors of the main financial institution, together with the financial group compliance officer, is responsible for taking the necessary measures for the secure sharing of

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information within the group. This responsibility also applies to the compliance officers of the financial institutions affiliated to the group and the boards of directors of these institutions.

* Financial institutions affiliated to the group cannot share information regarding suspicious transaction reporting.

9. EDUCATION POLICY

The purpose of the training policy is to ensure compliance with the obligations brought by the Law and the regulations and communiqués issued pursuant to the Law, to create a corporate culture by increasing the responsibility awareness of the personnel in terms of corporate policy and procedures and risk -based approach, and to update the information of the personnel.

Institution education Policy; It includes issues such as the functioning of the activities, who will be responsible for their realization, the determination of the personnel and trainers who will participate in the training activities, their training and training methods.

educational activities; carried out under the supervision and coordination of the compliance officer. The training program is prepared by the compliance officer with the participation of the relevant units. Oversees the effective execution of the Compliance Officer Training program.

Training activities are reviewed with the participation of the relevant units according to the results of measurement and evaluation and are repeated at regular intervals as needed.

Institution; in a way to ensure that training activities are spread throughout the group; organizing seminars and panels, forming working groups, using audio-visual materials in educational activities, internet, intranet or extranet etc. benefits from training methods such as computer-assisted training programs running on

Training topics include, at a minimum, the following:

- * Concepts of laundering proceeds of crime and financing of terrorism,
- * Stages and methods of laundering proceeds of crime and case studies on this subject,
- * Legislation on the prevention of laundering proceeds of crime and financing of terrorism,

- * Risk areas,
- * Institutional policy and procedures,
- * Within the framework of the law and relevant legislation;
- * Principles regarding the recognition of the customer,
- * Principles regarding suspicious transaction reporting,
- * Retention and submission obligation,
- * Obligation to provide information and documents,
- * Sanctions to be applied in case of non-compliance with obligations,
- * It covers the issues of international regulations in the field of combating money laundering and financing of terrorism.

Training dates, Regions or provinces where training is given, Training method, Total training hours, Number of trained personnel and their ratio to the total personnel, Distribution of training personnel according to their units and titles, Content of training, Titles and areas of expertise of trainers, etc. Statistical data on training results are kept by the compliance officer. Relevant Information and Statistics are reported to the Presidency through the compliance officer until the end of March of the following year.

The Presidency is authorized to organized training activities, to create computer-aided distance education programs that work over the Internet, and to take measures to ensure that its obliged employees have access to these programs for the purpose of training its obliged employees. The Presidency is also authorized to organized training programs for the training of trainers who will provide training to obliged parties, and to issue trainer certificates to those who successfully complete these programs. The obliged parties take care that the personnel who will take part in the training activities are among those who are given the trainer certificate.

10. INTERNAL AUDIT POLICY

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The purpose of internal auditing is to provide assurance to the board of directors regarding the effectiveness and adequacy of the overall compliance policy.

Within the scope of Internal Audit, whether the risk management, monitoring and control activities of the Institution's policies and procedures , and training activities are sufficient and efficient, the adequacy and effectiveness of the risk policy of the obligor, and whether the transactions are carried out in accordance with the Law and the regulations and communiquéés issued in accordance with the Law, and the institution's policies and procedures. They ensure that they are examined and audited as a risk-based approach.

Institution's internal audit activities are carried out by the person or unit authorized by the board of directors. In order to ensure that the personnel who will be authorized to carry out internal audit activities, work independently, the rule that they have not been assigned or authorized to carry out other measures within the scope of the compliance program will be complied with.

internal audit activities

*** Deficiencies, errors and** abuses revealed as a result of the internal audit, and opinions and suggestions to prevent their re-emergence are reported to the board of directors.

* While determining the scope of the audit, the deficiencies identified in the monitoring and control studies and the customers, services and transactions that contain risks are included in the scope of the audit.

*. While determining the units to be audited and transactions, the size of the obligor's business and transaction volume are taken into account. In this context, it is ensured that the units and transactions in quantity and quality that can represent all the transactions performed by the obligor are audited.

Necessary information and statistics regarding the audit activities carried out within the framework of the legislation are kept, archived and preserved on a regular basis.

Regarding the work carried out within the scope of the internal audit activity; Statistics containing information on the annual transaction volume of the institution, the total number of personnel and the total number of branches, agencies and similar affiliated units, the number of branches, agencies and similar units inspected, the dates of the inspections carried out in these units, the total duration of the inspection, the personnel employed in the inspection and the number of transactions inspected, It is notified to the Presidency by the compliance officer until the end of March of the following year.

11. DOCUMENTATION OF INFORMATION

In accordance with the Law on the Prevention of Laundering of Proceeds of Crime and the applicable legislation based on it, all information, documents and records that must be obtained and kept regarding customers and transactions are kept for at least 8 years, within the framework of the period and principles specified in the legislation and in a way that can be accessed when necessary.

Necessary measures are taken within the framework of the legislation regarding the protection and confidentiality of information, documents and records related to customers and transactions and are implemented with care.

Reporting activities to be carried out within the scope of continuous information disclosure and requests from institutions and officials legally authorized to request information and documents are evaluated with the utmost care and diligence within the framework of the legislation.

Institution policy is submitted urgently when requested by the Presidency or supervisory staff.

12. VARIOUS MATTERS

While establishing corporate policies, Law No. 5549 on Prevention of Laundering Proceeds of Crime and Law No. 6415 on Prevention of Financing of Terrorism, Law No. 7262 on the Prevention of Financing of Weapons of Mass Destruction, and regulations and communiqués prepared in accordance with these laws and other national and international organizations (provided that they do not contradict them). FATF, EU, OFAC, UN, Wolfsberg , etc.) recommendations, principles, standards and guides are taken into account.

The international documents that have been taken into account in this context are listed below.

- FATF's 40+9 Recommendations and Implementation Methodology Criteria document
 - FATF Recommendations
 - FATF Methodology
- Basel Principles (Know Your Customer principles)
- EU Directives
 - [EU Directive 2005/60 EC](#)
 - [Directive 2001/97/EC Amending Directive 91/308/EEC Concerning the Prevention of Using the Financial System for Money Laundering](#)
 - [1991/308/EEC on the Prevention of Money Laundering](#)
 - [Money Laundering, Identification, Monitoring, Freezing, Seizure and Confiscation of Vehicles and Proceeds of Crime, numbered 2001/500/JHA](#)

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- [Council Decision of 17 October 2000 on the Arrangements for Cooperation between the FIUs of the Member States in Concerning the Exchange of Information No. 2000/642/JHA](#)
- [Money Laundering, Identification, Monitoring, Freezing, Seizure and Confiscation of Vehicles and Proceeds of Crime No 1998/699/JHA](#)
- UN Security Council Resolutions
 - [United Nations Convention Against Smuggling of Narcotic Drugs and Psychotropic Substances \(Vienna Convention\)](#)
 - [United Nations Convention against Transnational Organized Crime \(Palermo Convention\)](#)
 - [UN Policy Statement and Action Plan Against Money Laundering](#)
 - [UN Global Program Against Money Laundering \(GPML\)](#)
- [Wolfsberg Principles](#)
- [OFAC–OFSI-HM Treasury](#)

In accordance with Law No. 6415 on Prevention of Financing of Terrorism and Law No. 7262 on Prevention of Financing of Weapons of Mass Destruction, decisions to freeze assets are followed.

Institutional policies and procedures; It is formed in written form with the participation of all relevant units and under the supervision and coordination of the compliance officer.

The institution informs the relevant personnel about the institution's policies. Institution policy and procedures come into effect after being approved by the Board of Directors. It is communicated to the relevant personnel by obtaining their signatures.

Institutional policies and procedures The measures in the first and third paragraphs of the compliance program are reviewed at least every two years and necessary updates are made.

The board of directors is ultimately responsible for the adequate and effective execution of the entire compliance program in accordance with the scope and characteristics of the obligor's activities. The board of directors of the parent financial institution is ultimately responsible for overseeing the execution of the compliance program at the institution level. the board of directors, within the scope of the first paragraph; To appoint compliance officer and assistant compliance officer, to clearly and in writing define the authorities and responsibilities of the compliance officer and compliance unit, to approve the corporate policies, annual training programs and changes to be made in these according to developments, to implement the risk management, monitoring and control and internal processes carried out within the scope of the compliance program. It is authorized and responsible for evaluating the results of audit activities, taking the necessary

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measures to correct the detected errors and deficiencies in a timely manner, and ensuring that all activities within the scope of the compliance program are carried out effectively and in coordination.

13. FORCE

This policy is effective from the date of its publication.Revision Date:31.01.2025

Prepared	Controlling	Approver	Approval date
Bekir HANÇERLİ Compliance Officer	Ahmet Emin AHLATCI CEO	Ahmet AHLATCI Chairman of the Board	31 JANUARY 2025