

KoçSistem

**POLICY ON PREVENTION OF
LAUNDERING THE PROCEEDS OF CRIME,
FINANCING OF TERRORISM AND
WEAPONS OF MASS DESTRUCTION
("AML-CFT POLICY")**

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1 PURPOSE AND SCOPE

The purpose of this Policy on Prevention of Laundering the Proceeds of Crime, Financing of Terrorism and Weapons of Mass Destruction ("the Policy") is to establish principles and rules to be implemented within KoçSistem as a reflection of KoçSistem's commitment to prevent money laundering and the financing of terrorism. All employees, directors and officers of KoçSistem shall comply with this Policy, which is an integral part of the KoçSistem Code of Ethics. KoçSistem company¹ also expects and takes necessary steps to ensure that all its Business Partners - to the extent applicable - comply with and/or act in accordance with this Policy

2 DEFINITIONS

"Governmental/Public Official" broadly refers to a variety of individuals including but not limited to the following:

- Employees working at government bodies domestically or in a foreign country,
- Employees of government business enterprises (domestic or in a foreign country)
- Employees of political parties, political candidates, (domestic or in a foreign country)
- Any person who holds a legislative, administrative or judicial position, (domestic or in a foreign country),
- Judges, jury members, or other officials who work at domestic, foreign or international courts,
- Officials or representatives working at national or international parliaments;
- Arbitrators resorted to, who have been entrusted with a task within the arbitration procedure, in order to resolve a legal dispute.

"FATF (Financial Action Task Force)" is an international organization established in 1989 to develop policies and standards to combat a range of crimes, including the prevention of money laundering, human and drug trafficking, terrorism and the financing the weapons of mass destruction.

"Ultimate Beneficial Owner ("UBO")" refers to the natural person(s) who ultimately controls or has ultimate influence over a legal entity or an unincorporated entity.

"Business Partners" includes suppliers, distributors, dealers, authorized services and other third parties with whom business relations are established, and all kinds of representatives, subcontractors, consultants, etc. acting on behalf of the company, and their employees and representatives.

"Politically Exposed Person ("PEP")" refers to individuals who are currently or in the past, either domestically or in a foreign country, elected or appointed to an important public function; board members, senior executives and deputy executives of international organisations and other persons holding equivalent positions; senior politicians; senior officials of political parties; senior judicial, administrative or military officials; senior executives of state-owned enterprises; and the spouses, first-degree relatives (mother, father and children) and relatives of all such persons.

"Weapons of Mass Destruction" refers to nuclear, chemical and biological weapons and ballistic missile programmes as defined by the United Nations Security Council Resolutions.

"Koç Group" means all companies directly or indirectly, individually or jointly controlled by Koç Holding A.Ş. and Koç Holding A.Ş., as well as the joint ventures included in the consolidated financial report of Koç Holding A.Ş. .

"KoçSistem" means KoçSistem Information and Communication Services Inc.

"Proceeds of Crime" means the value of the assets resulting from the Crime.

"Laundering Proceeds of Crime" is the integration of proceeds from illegal activities into the financial system as if they were obtained legally, concealing the fact that these proceeds are derived from illegal activities.

"Financing terrorism" refers to activities that provide material support to terrorist individuals, groups, organizations, or supporters of terrorism.

3 GENERAL PRINCIPLES

In order to manage the risks it may be exposed to in relation to the financing of the Laundering of Proceeds of Crime, terrorism and the proliferation of Weapons of Mass Destruction (**"AML-CFT"**¹), **KoçSistem** implements the relevant legislation in all its transactions by making use of the studies and guidance carried out by leading international organizations in this field.

It is strictly not tolerated for KoçSistem employees to directly or indirectly facilitate the Laundering of Proceeds of Crime or the financing of the proliferation of terrorism

¹ AML-CFT: "Anti-Money Laundering / Countering the Financing of Terrorism"

and Weapons of Mass Destruction, to engage in, assist or participate in any activity that may cause the possibility of illegally concealing the nature of transactions or that results in proceeds of crime.

In this context, in all transactions to which KoçSistem is a party,

- Necessary measures should be taken for the effective management of risks associated with AML-CFT,
- In order to determine who the Business Partners and their customers are, Due Diligence and, if necessary, Extended Due Diligence ("²EDD") should be carried out in accordance with the legislation and regularly,
- In case of detection of unusual and suspicious activities, the transaction should be investigated in detail and, if necessary, stopped immediately and the legal authorities should be informed³.

4 Application of the Policy

4.1. Know Your Business Partner⁴

In order to identify possible risks associated with AML-CFT before establishing a continuous business relationship with a Business Partner and before the execution of transactions of significant size according to the company's activities and financial structure, even if it is regular or one-time during the established business relationship, the business and operations units are responsible for the It is responsible for conducting a Due Diligence Study through a scanning tool by obtaining all necessary commitments in accordance with the legislation on the protection of personal data in force in the countries where the company operates. In order for this work to be carried out effectively, the following points are taken into account⁵:

- The tax office and numbers of the Business Partners, their authorized representatives and the valid identity and address information of their shareholders (if any) accepted by the legal authorities are determined. This information obtained is confirmed if necessary within the scope of the relevant legislation or in case of doubt about its reliability and validity. In addition, examinations are carried out to determine the Real Beneficiaries (UBO) in accordance with the legislation. Detailed information is obtained about the profession, the industry in which it operates, the line of business from which

² For details, please refer to KoçSistem Supply Chain Compliance Policy and KoçSistem Sanctions and Export Controls Policy.

³ Legal authorities are informed by a lawyer in charge of the Legal and Compliance Consultancy Offices or appointed from outside in this regard.

⁴ All procedures in this Policy regarding identification are also valid for customers with whom a continuous business relationship will be established.

⁵ In the listed processes, the main responsibility lies with the business and operation units.

income is generated, how long it has been operating in this business line and its commercial history.

- Information is obtained about the type and level of activity of the current and potential business relationship with KoçSistem.
- Information is obtained about the countries and geographies in which the declared line of business is carried out⁶.
- During and after the establishment of the business relationship,⁷ national/international sanctions lists and negative media news checks are carried out on a regular basis through a screening tool to determine⁸ whether the Business Partner or UBO is involved in financial crime or other serious crimes, as well as possible risks associated with sanctions and export control arrangements.
- Whether the Business Partner⁹ or UBO is a Public Official or a Public/Politically Exposed Person is confirmed by searching through the internet, media scanning and other databases.
- All information, documents and records obtained are updated periodically and kept for a minimum of 8 years from the date of the last transaction.

As a result of the Due Diligence Study, which is carried out by taking into account all the information obtained, in case of any negativity, reasonable suspicion or a possible violation of this Policy or the legislation, the department or officer responsible for compliance is immediately informed. In this case, the department or officer responsible for compliance may decide to stop the process or perform an Extended Due Diligence Study ("EDD") on the persons concerned. In this case, the General Manager of KoçSistem is informed about the identified compliance risks and the possible effects of these risks on the relevant KoçSistem, and what measures can be taken in case of the proposal to establish or terminate a business relationship or to continue the existing business relationship. The General Manager makes the decision to start, maintain or terminate the business relationship, taking into account the evaluations and recommendations contained in the said EDD report. Decisions taken with the approval of the General Manager are regularly reported to Koç Holding Legal and Compliance Consultancy by KoçSistem Legal and Compliance Consultancy, and the entire process is subject to internal audit if deemed necessary. Relevant units or compliance officers should consult KoçSistem Legal and Compliance Consultancy when they have any doubts about the action to be taken.

⁶ Business and operation units are obliged to pay special attention to the business relations and transactions they will enter into with real and legal persons residing in risky countries, unincorporated entities and citizens of these countries, to collect and record information as much as possible about the purpose and nature of transactions that do not have a reasonable legal and economic purpose.

⁷ If the Business Partner is a legal entity, the necessary checks for shareholders (if any) and legal representatives are also carried out through the screening tool.

⁸ For details, please refer to KoçSistem Sanctions and Export Controls Policy.

⁹ If the Business Partner is a legal entity, the necessary checks for shareholders (if any) and legal representatives are also carried out through the screening tool.

When KoçSistem concludes any contract with a Business Partner, they ensure that provisions are included regarding the information of the relevant persons about this Policy. In addition, if it is determined that this Policy has been violated in any way in the signed contracts, the right to terminate the contract in question or to apply other possible sanctions is reserved.

4.2. Suspicious Transactions

KoçSistem employees are expected to be alert to signs of AML-CFT risk at all times. In case of any suspicion that the assets subject to the transaction have been obtained illegally or used for illegal purposes, used for the purpose of financing terrorism in this context, or related to or connected with them, the department or officer responsible for compliance should be informed about the transaction¹⁰ immediately through the Suspicious Transaction Forms.

The following transactions and activities can be considered as examples of suspicious transactions:

- Individuals who do not provide complete information, provide incorrect, inconsistent or suspicious information, or are reluctant, hesitant or obstructive with respect to reporting and/or recordkeeping requirements,
- Requesting payments to be made, especially in cash or cash-like forms, or to different bank accounts on behalf of third parties,
- Persons and transactions related to jurisdictions designated as high-risk by the FATF,¹¹
- Making payments in currencies other than those specified in the contracts, using cryptocurrencies in transactions, or requesting them,
- Making payments to third parties whose names are not included in the relevant contracts or receiving payments from such third parties or using exchange offices as intermediaries in transaction Making payments to, or receiving payments from, third parties not named in the relevant contracts, or using exchange offices as intermediaries in transactions,
- Making payments to "shell bank" accounts or to individuals or entities located in countries known as "tax havens", or transferring funds to/from unrelated foreign countries,
- Payments to or from organizations where it is not possible to identify the ownership structure or determine the Ultimate Beneficial Owner (UBO),

¹⁰ Suspicious Transaction Forms should be created by the department or officials responsible for compliance and shared with business and operational units.

¹¹ As of the effective date of this Policy, North Korea, Iran and Myanmar are on the FATF's list of High Risk Countries. Stricter measures may be implemented and the list of risky countries may be expanded by the department or officials responsible for compliance in consultation with Koç Holding Legal and Compliance Consultancy.

- Transactions involving persons whose names appear on lists of persons suspected of money laundering as a result of checks carried out using the screening tool,
- Payments made in small amounts and through several different financial institutions.

It is important for all employees to be vigilant in this regard, to act decisively and in accordance with procedures if a risky transaction is identified, and to consult the officer or department in charge of compliance if in doubt..

4.3. Training

Under the coordination of the department responsible for compliance and human resources at KoçSistem, various training and awareness-raising activities are organized in order to increase the responsibility awareness of the employees and to create a common corporate culture on this occasion, taking into account the legislation, this Policy and other relevant internal procedures on the issue of preventing the financing of the Laundering Proceeds of Crime, Terrorism and the Proliferation of Weapons of Mass Destruction. These activities are carried out in accordance with the latest local and international regulations, and all activities carried out are regularly reported to Koç Holding Legal and Compliance Consultancy by the department responsible for compliance.

5 AUTHORITY AND RESPONSIBILITIES

All employees and managers of KoçSistem are responsible for complying with this Policy and implementing and supporting their relevant procedures and controls in line with the requirements of this Policy. KoçSistem expects all Business Partners to act in accordance with this Policy and takes the necessary steps to do so, to the extent applicable to the relevant party and the transaction.

In the event of a discrepancy between this Policy and the local legislation applicable in the countries where KoçSistem operates, the more restrictive policy or legislation shall prevail to the extent that the relevant application does not contradict the local legislation.

If you are aware of any action that you believe is contrary to this Policy, the current legislation, or the Koç Group Code of Ethics and the KoçSistem Code of Ethics, you may consult or report this matter to your senior manager. Alternatively, you can report to Koç Holding Ethics Line at "koc.com.tr/ihbarbildirim".

KoçSistem's employees may consult KoçSistem Legal and Compliance Consultancy directly or via kshukukuyummusavirligi@kocsistem.com.tr address regarding their questions about this Policy and its implementation . Violation of this Policy by an

employee may result in significant disciplinary action, including dismissal. In the event that any third party that is expected to act in accordance with this Policy acts contrary to this Policy, the relevant contracts may be terminated.

6 REVISION HISTORY

This Policy has entered into force with the decision of the Board of Directors dated 26.06.2024 and KoçSistem Legal and Compliance Consultancy is responsible for updating the Policy.

Revision	History	Explanation