

GARANTI GLOBAL

ANTI-MONEY LAUNDERING (AML) AND COUNTER-TERRORIST FINANCING (CTF) POLICY

Last Updated: July 16, 2025

1. INTRODUCTION

Garanti Global ("the Company", "We", "Us", "Our") is fully committed to conducting business in accordance with the highest ethical standards and applicable anti-money laundering (AML) and counter-terrorist financing (CTF) laws and regulations.

This Policy sets out the framework under which Garanti Global prevents, detects, and reports money laundering, terrorist financing, and other financial crimes.

All employees, officers, and affiliates of the Company are required to comply with this Policy without exception.

2. LEGAL AND REGULATORY FRAMEWORK

This Policy is developed in line with international standards, including:

- The Financial Action Task Force (FATF) Recommendations,
- European Union AML Directives (where applicable),
- General Data Protection Regulation (GDPR) principles for lawful data handling,
- Local AML/CTF laws of the Company's jurisdiction.

3. DEFINITIONS

Money Laundering (ML): The process of disguising the origins of illicitly obtained funds.

Terrorist Financing (TF): Providing or collecting funds with the intention to support terrorist activities.

Customer Due Diligence (CDD): Measures undertaken to verify the identity of clients and assess risk.

Enhanced Due Diligence (EDD): Additional checks applied to high-risk clients or transactions.

Politically Exposed Persons (PEPs): Individuals with prominent public functions who may pose higher AML risk.

4. CUSTOMER DUE DILIGENCE (CDD)

Garanti Global applies strict Know Your Customer (KYC) procedures before establishing a business relationship.

At minimum, the following information must be collected and verified:

- Full legal name,
- Date of birth/incorporation,
- Valid government-issued identification,
- Proof of residential or business address,
- Source of funds and wealth (when applicable).

No anonymous or fictitious accounts are permitted.

5. ENHANCED DUE DILIGENCE (EDD)

Higher-risk categories require enhanced measures, including but not limited to:

- Politically Exposed Persons (PEPs) and their relatives or associates,
- Clients from jurisdictions with weak AML/CTF regimes,
- Unusually large, complex, or inconsistent transactions.

EDD measures may include requesting additional documentation, senior management approval, and closer ongoing monitoring.

6. ONGOING MONITORING

All client activity is subject to continuous monitoring to detect unusual or suspicious transactions. Automated monitoring systems and manual reviews are used to flag:

- Sudden large deposits or withdrawals,
- Rapid movement of funds without economic rationale,
- Structuring or layering activities,
- Transactions with high-risk jurisdictions.

Suspicious Activity Reports (SARs) are filed with the competent Financial Intelligence Unit (FIU) where required.

7. RECORD-KEEPING

All KYC, CDD, and EDD documentation must be securely stored for a minimum of five (5) years after termination of the client relationship, unless longer retention is required by law.

Records include identification documents, transaction histories, correspondence, and internal review notes.

8. TRAINING AND AWARENESS

All employees receive mandatory AML/CTF training upon hiring and annually thereafter.

Training covers:

- Identification of suspicious activity,
- Procedures for escalation and reporting,
- Legal obligations and potential consequences of non-compliance.

9. REPORTING OBLIGATIONS

Employees are required to immediately escalate suspicious activity to the Compliance Officer.

The Compliance Officer shall assess the report and, if necessary, file a SAR with the FIU.

The Company and its employees are prohibited from tipping off clients regarding ongoing investigations or SAR filings.

10. DATA PROTECTION

AML/CTF measures shall be implemented in compliance with applicable data protection regulations, including GDPR where applicable.

Personal data shall only be processed for the purposes of preventing money laundering and terrorist financing and shall be adequately protected.

11. GOVERNANCE

Garanti Global has appointed a Compliance Officer responsible for the implementation and enforcement of this Policy.

The Compliance Officer reports directly to the Board of Directors and ensures the adequacy of the Company's AML/CTF program.

12. REVIEW AND AMENDMENTS

This Policy is reviewed at least annually or whenever significant regulatory or operational changes occur.

The Company reserves the right to amend this Policy in line with evolving regulatory requirements.

13. CONTACT

For further information regarding this Policy, please contact:

Garanti Global – Compliance Department

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