ANADOLUBANK A.Ş.

PROCEDURE OF PREVENTION OF LAUNDERING PROCEEDS OF CRIME

- 1. OBJECTIF
- 2. SCOPE
- 3. SCOPE OF APPLICATION AND RESPONSIBILITY
- 4. DEFINITIONS
- 5. CONCEPTS
 - 5.1. MONEY LAUNDERING
 - 5.2. COMBAT WITH MONEY LAUNDERING
 - 5.3. LEGAL DIMENSION RELATING TO MONEY LAUNDERING
 - 5.4. DEFINITION OF TERROR AND TERRORISM FINANCING
 - 5.5. LEGAL DIMENSION RELATING TO FINANCING OF TERRORISM
 - 5.6. METHODS OF LAUNDERING
 - 5.6.1 Smurfing
 - 5.6.2 Structuring
 - 5.6.3 Off-shore centers
 - 5.6.4 Shell companies
 - 5.6.5 Cash-Intensive Businesses
 - 5.6.6 Loan-Back Method
 - 5.6.7 Currency Exchange Offices
 - 5.6.8 Informal Value Transfer Systems
 - 5.6.9 Fraudulant Trade Documents- Overinvoiced Exports or Imports
 - 5.6.10 Currency Smuggling
 - 5.6.11 Cyber Laundering
 - 5.7. STAGES OF MONEY LAUNDERING
 - 5.7.1 Placement
 - 5.7.2 Layering
 - 5.7.3 Integration
 - 5.8. FUNDEMENTAL PRINCIPLES OF COMBAT WITH MONEY

LAUNDERING

- 5.9. BRIBERY
- 5.10. ILLEGAL BETTING AND GAMBLING
- 6. OBLIGATIONS
 - 6.1. CUSTOMER IDENTIFICATION
 - 6.2. SUSPICIOUS TRANSACTION REPORTING
 - 6.3. RECORD RETENTION
 - 6.4. INTERNAL AUDIT/RISK MANAGEMENT/TRAINING
 - 6.5. PROVIDING INFORMATION AND DOCUMENTS
 - 6.6. PERIODICALLY REPORTING
 - 6.7. ELECTRONIC NOTIFICATION
- 7. COMPLIANCE PROGRAM WITH OBLIGATIONS OF ANTI-MONEY
- LAUNDERING AND COMBATING THE FINANCING OF TERRORISM
 - 7.1. RESPONSIBILITIES OF BOARD OF DIRECTORS
 - 7.2. KEY ELEMENTS OF COMPLIANCE PROGRAM
- 8. SCOPE OF INSTITUTIONAL COMPLIANCE POLICY
 - 8.1. RISK MANAGEMENT POLICY
 - 8.2. MONITORING AND CONTROLLING POLICY
 - 8.3. TRAINING POLICY
 - 8.4. INTERNAL AUDIT POLICY
- 9. PENALTIES
- 10. RELATED DOCUMENTS
- 11. POLICY REVISION FOLLOW-UP FORM