## the Wolfsberg Group

Financial Institution Name: Location (Country) : KUVEYT TURK KATILIM BANKASI A.Ş. TURKIYE

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. It 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.

	TITY & OWNERSHIP	Answer
1	Full Legal Name	
		KUVEYT TURK KATILIM BANKASI A.Ş.
		,
2	Append a list of foreign branches which	
2	Append a list of foreign branches which are covered by this questionnaire	
	uns questionnalle	https://www.lance.th.uk.aam.te/aam.te
		https://www.kuveytturk.com.tr/en/branches-and-atms
3	Full Legal (Registered) Address	
		Büyükdere Cad. No: 129/1 Kat: 11 34394 Esentepe / İstanbul / Türkiye
	•	
4	Full Primary Business Address (if different from above)	
	and the same of th	
5	Date of Entity incorporation/establishment	
	·	
		22.11.1988
6	Select type of ownership and append an ownership chart	AND CONTRACTOR OF THE CONTRACT
	if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker	No.
· · · ·	symbol	
	Зупьо	
		1
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	
		57.81% of Kuveyt Türk's capital belongs to Kuwait Finance House.
	_	
7	% of the Entity's total shares composed of bearer shares	
	s and the sound of bearer shares	
		NA NA
В	Dogo the Entity of the State of	
•	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
3 a	If V provide the name of the	
- 4	If Y, provide the name of the relevant branch/es which operate under an OBL	
	operate under an OBL	
)	Does the Bank have a Virtual Bank License or provide	
	services only through online channels?	no
0	Name of primary financial regulator/supervisory authority	
	. , , =====	
		Banking Regulation and Supervision Agency (BBDK)
		- Garaj (Sasari)
1	Provide Legal Entity Identifier (LEI) if available	
	Trovide Legal Littity Identifier (LEI) if available	
	1	4747VD 00000 ME 700
		474ZXR.00009.ME.792
	Provide the full legal name of the ultimate parent (if	
2	different from the Entity completing the DDQ)	
2		Kuwait Finance House 57.81%
2		
2		
2 3	Jurisdiction of licensing authority and regulator of ultimate	
	Jurisdiction of licensing authority and regulator of ultimate parent	
	Jurisdiction of licensing authority and regulator of ultimate parent	Central Bank of Kuwait

	None and the second sec	
4	Select the business areas applicable to the Entity	SECTION AND AND AND AND AND AND AND AND AND AN
4 a	Retail Banking	es
4 b	Private Balikilly	es
4 c	Commercial banking	es
4 d	Transactional parking	es
4 e	Investment banking	res
4 f	Financial Markets Hading	/es
4 g	Sectiones Services/Custody	lo
4 h	Broker/Dealei	lo
4 i	Militiateral Development Dank	No
4 j	Wealth Management	/es
4 k		SME Banking, Gold Bnaking, Project Financing, Trade Finance Services, Correspondent Banking
15	resident means customers primarily resident in a different jurisdiction to the location where bank services are	No
15 a	If Y, provide the top five countries where the non- resident customers are located.	
	O I - 4 the algorithmatical	
16	Select the closest value:	5001-10000
16 a	Number of employees	Greater than \$500 million
16 b	Total Assets  Confirm that all responses provided in the above Section	
17	are representative of all the LE's branches.	Yes
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.	Private banking products and services are within the scope of high risk. We apply EDD.
a anani	JCTS & SERVICES	
19	Does the Entity offer the following products and services:	
40 -	Correspondent Banking	Yes
19 a	If Y	
19 a1	Does the Entity offer Correspondent Banking	Yes
19 a1a	services to domestic banks?  Does the Entity allow domestic bank clients to	
19 a1b	provide downstream relationships?	No
19 a1c	Does the Entity have processes and procedures in place to identify downstream relationships with domestic hanks?	Yes
19 a1d	Does the Entity offer Correspondent Banking	Yes
19 a1e	Does the Entity allow downstream relationships with foreign banks?	No
19 a1f	Does the Entity have processes and procedures place to identify downstream relationships with foreign banks?	in
19 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesse (MSBs)/Money Value Transfer Services (MVTSs	s No
19 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provide (PSPs)?	
	MSBs	No
19 a1h1	IVIODS	
19 a1h1 19 a1h2	MVTSs PSPs	No No

115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
		·
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
	TY ASSURANCE /COMPLIANCE TESTING	
117	Does the Entity have a program wide risk based Quality Assurance programme for financial crime (separate from	Yes
	the independent Audit function)?	
118	Does the Entity have a program wide risk based Compliance Testing process (separate from the	V
	independent Audit function)?	Yes
119	Confirm that all responses provided in the above Section	Yes
119 a	are representative of all the LE's branches  If N, clarify which questions the difference/s relate to	165
1134	and the branch/es that this applies to.	
120	If appropriate, provide any additional information/context	
	to the answers in this section.	
13. AUDIT		
121	In addition to inspections by the government	
	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,	Yes
	Fraud and Sanctions policies and practices on a regular	
122	basis?  How often is the Entity audited on its AML, CTF, ABC.	Comment of the Commen
122	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yeariy
122 b	External Third Party	Yearly
123	Does the internal audit function or other independent third party cover the following areas:	
123 a	AML, CTF, ABC, Fraud and Sanctions policy and	Yes
400 h	procedures Enterprise Wide Risk Assessment	
123 b 123 c	Governance	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions Training & Education	Yes
123 I	Other (specify)	Tes
124	Are adverse findings from internal 9 automat audit	
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and	Yes
	completeness?	
125	Confirm that all responses provided in the above section are representative of all the LE's branches	Yes
125 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
126	If opposite and the control of	
120	If appropriate, provide any additional information/context to the answers in this section.	
14. FRAU		
127	Does the Entity have policies in place addressing fraud risk?	Yes
128	Does the Entity have a dedicated team responsible for	
	preventing & detecting fraud?	Yes

106 b	United States Department of the Treasury's Office of	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Foreign Assets Control (OFAC) Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners and for filtering transactional data
	(OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d		
106 e	Lioto mamamou by the control of the	Not used
106 f	Other (specify)	KUWAIT CENTRAL BANK , TURKISH MINISTRY OF INTERIOR LIST
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	Same day to 2 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.	
11. TRAINI	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 :	
112 112 a	Board and Senior Committee Management	Yes
	1st Line of Defence	Yes
112 b	2nd Line of Defence	Yes
112 c	3rd Line of Defence	Yes
112 d 112 e	Third parties to which specific FCC activities have been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not Applicable
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, CTI and Sanctions staff?	Yes
114 a	If Y, how frequently is training delivered?	Every Two Years
115	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	l tes

93	Does the Entity have policies, procedures and processes	
	to comply with and have controls in place to ensure	
	compliance with:	是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
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	
		Please visit the below link to reach the Turkish local legislations : https://en.hmb.gov.tr/fcib-national-legislations
93 c	If N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section	Yes
	are representative of all the LE's branches	res
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context	
	to the answers in this section.	
10. SANCT	TIONS	
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?	Yes
99	Does the Entity have policies, procedures, or other	
	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 within the other entity's local jurisdiction)?	Yes
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?	Yes
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions	Automated
102 a	screening?  If 'automated' or 'both automated and manual'	
	selected:	
102 a1		Both
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Name of the tool : PayGate Analyzer Vendor: Fineksus
102 a2	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)	<1 year
103	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
104		Automated
105	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
106	transactions are subject to sanctions screening?	
	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 and for filtering transactional data
	Caroliona Fiat (O14)	- and a substantial data

	If V indicate who provides the approval:	Both
78 a	If Y indicate who provides the approval:  Does the Entity have specific procedures for onboarding	2001
79	entities that handle client money such as lawyers, accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality	Yes
B1	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.	
2 MONITO	DRING & REPORTING	
83	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	Yes
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Automated
84 a	If manual or combination selected, specify what type of transactions are monitored manually	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	Name of the tool : PayGate Analyzer Vendor: Fineksus
84 b2	When was the tool last updated?	<1 year
84 b3	When was the automated Transaction Monitoring application last calibrated?	<1 year
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes
00	Does the Entity have processes in place to send	
89	Requests for Information (RFIs) to their customers in a timely manner?	Yes
90	Requests for information (RFIs) to their customers in a timely manner?  Confirm that all responses provided in the above Section	
	Requests for Information (RFIs) to their customers in a timely manner?	
90	Requests for Information (RFIs) to their customers in a timely manner?  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	Yes
90 90 a 91	Requests for Information (RFIs) to their customers in a timely manner?  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	Yes

	T	E.
69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening	
	customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Automated
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:	
74 a1	Less than one year	No
74 a2	1 – 2 years	Yes
74 a3	3 – 4 years	Yes
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	1 year for high risk 2 years for medium risk 3 years for risk customers
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	Restricted
76 b	Respondent Banks	Restricted
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	
76 c	Embassies/Consulates	Always subject to EDD
76 d	Extractive industries	Always subject to EDD
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	Always subject to EDD
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	Restricted
76 i	Non-account customers	Restricted
76 j	Non-Government Organisations	Restricted
76 k	Non-resident customers	EDD on risk-based approach
76 I	Nuclear power	Prohibited
76 m	Payment Service Providers	Restricted
76 n	PEPs	Always subject to EDD
76 o	PEP Close Associates	Always subject to EDD
76 p	PEP Related	Always subject to EDD
76 q		Always subject to EDD
76 r		Prohibited
76 s	Regulated charities	Restricted
76 t	Shell banks	Prohibited
76 u	Travel and Tour Companies	EDD on risk-based approach
76 v	Unregulated charities	Prohibited
76 w		EDD on risk-based approach
76 x		Prohibited
76 y	Other (specify)	
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/or compliance approval?	Yes

		,
58 e	Name determing	/es
58 f	Transaction Corconning	/es
58 g		/es
59	Has the Entity's Sanctions EWRA been completed in the	r'es
	last 12 months?	
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
	Confirm that all responses provided in the above Section .	
60	are representative of all the LE's branches	Yes
	If N, clarify which questions the difference/s relate to	
60 a	and the branch/es that this applies to.	
	and the brancines that this applies to.	
61	If appropriate, provide any additional information/context	
	to the answers in this section.	
	,	
	1	
	DD and EDD	Yes
62	Does the Entity verify the identity of the customer?  Do the Entity's policies and procedures set out when	100
63	Do the Entity's policies and procedures set out when	Yes
	CDD must be completed, e.g. at the arms of the series	100
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
	when conducting CDD? Select all that apply:	Yes
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	
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:	
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	Yes
66	What is the Entity's minimum (lowest) threshold applied to	25%
	beneficial ownership identification?	2070
67	Does the due diligence process result in customers	Yes
	receiving a risk classification?	The state of the s
67 a	if Y, what factors/criteria are used to determine the	
	customer's risk classification? Select all that apply:	是一种,我们就是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
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
	For high risk non-individual customers, is a site visit a par	
68	of your KYC process?	Yes
68 a	If Y, is this at:	Yes
68 a1	Onboarding KYC renewal	Yes
68 a2		Yes
68 a3	Trigger event	100
68 a4	Other	
68 a4a	If yes, please specify "Other"	
69	Does the Entity have a risk based approach to screening	
53	customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
		Yes
03 az	101010101	
69 a2	KYC renewal	Yes

55 c PEP Identification Yes 55 d Transaction Screening Yes 55 e Name Screening against Adverse Media/Negative News 55 f Training and Education Yes 55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below: 57 b Product Yes 57 c Channel Yes 57 d Geography 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: 58 a Customer Due Diligence Yes 59 Governance Yes 50 Governance Yes 50 Governance Yes 51 Customer Due Diligence Yes 52 Documents detailed below: 55 A Customer Due Diligence Yes 56 Governance			
employees  ### Committee in process, where appropriate, for terminating and process of the process, where appropriate, for terminating and process of the process of terminating and process of the process of terminating desires for transcription and the process of terminating desires for transcription across the employee across the entity, including crime reasons that applies across the entity, including crime reasons that applies across the entity, including crime reasons for the processors of the control of th	49 i		V
society automore relationships due to financial crime  10			Yes
society automore relationships due to financial crime  10	49 i		
first Coffine that process for existing clients for financial for the process for existing clients for financial for the process and efficience for receasors if they exist for establishing corner coactions  PEPPs and Review Media/Negative News for the processes for the maintenance of internal for the processes for the above Section for the processes for all the LP's boundary for the processes fo			Yes
crime reasons that applies across the entity, including by fore proposes and controls to literate and included by the proposes and controls to literate and included controls and controls to literate and an across and controls to literate and an across and across before any across and controls to literate and an across and across before any across and across across and across ac			
foreign branches and efficience  1	49 k		
Define the process and controls to identify and handle customers that were prevailed soft of interestinated crimin exections if they seek to re-establish a secretary of the process of the secretary of the process of the secretary of the secretary of the secretary of the maintenance of interest of the secretary			Yes
customers that were previously existed for financial contentions of the reactor of the year of the contention of the processes of the maintenance of internal vesticities?  50 Cutflier the processes for the maintenance of internal vesticities?  51 Has the Cirty defined a risk beleance statement or similar document which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect which diese as risk bornal your ground and internal connect with a great ground training and the processes of the connect of t		foreign branches and affiliates	
crime reasons if they seek to re-stabilish a relationship relationship of the stationship	49 !		
de m Culiente processes regarding screening for sanctions. PEPP and Adverse Median Negative News  49 n Culien the processes the maintenance of intenal Negative the first perferred arisk tolerance and intenal Negative the first perferred arisk tolerance statement or shriller document which defines a risk boundary around shriller the risk passes are shriller to the strain of the strain			Yes
49 m Outline the processes regarding creening for secreting for secretin			
sanctions, PEPs and Adverse Medial/Negative News  4 n	49 m		
Guilline the processes for the maintenance of internal variabilities?  100 Has the Entity defined a risk tolerance statement or similar document which defines a risk bounday around vise flusiness?  11 Does the Entity defined a risk tolerance statement or similar document which telested part of the Entity of t	III	sanctions. PEPs and Adverse Media/Negative News	Yes
"vatchillats"  Nes be fully defined a risk tolerance statement or similar document which defines a risk boundary around their business?  Does be tolerance the full defines a risk boundary around their business?  I a Does be considered to proceed the state of the st	40 n		
Has the Entity defined ansk tokennes statement or similar document which effense ansk boundary around their business?  51 Does the Entity have record retention procedures that comby with applicable leave?  51 If you will be the retention period?  52 Confirm that all responses provided in the above Section are representative of all the LEs branches.  52 a If no properties, provide any additional information/context to the answers in this applies to.  53 If appropriate, provide any additional information/context to the answers in this applies to.  54 Deet the Entity's MAL SCTE WIRA cover the inherent risk components detailed below.  54 Clent  55 Product  56 Contend  57 Contend  58 Contend Deligence  58 Decidences composed stateled below.  58 Decidences composed stateled below.  59 Product  50 Contend	49 N		Yes
similar document which defines a nik boundary around her business?  51 Does the Entity have record retention procedures that comby with applicable bews?  51 a If Y, what is the retention period?  52 Confirm that all responses provided in the above Section are representative of all the LE's branches  53 a If A, Carlify Which questions the difference at relate to and the branchive fieth this applies to.  53 a If appropriate, provide any additional information/context to the answers in this section.  54 a Control that all responses provided in the above Section are representative of all the LE's branches  55 a If appropriate, provide any additional information/context to the answers in this section.  55 a If appropriate, provide any additional information/context to the answers in this section.  56 a Control to the answers in this section.  57 a Column You are the Column You ar	50		
their business?  1 Does the Entity have record retention procedures that comply with applicable laws?  1 If y, what is the netention period?  2 Confirm that all responses provided in the above Section as representative of lath LLTS branches are completed to any expression of the section of	00		Ves
51 a		their business?	
comply with applicable lawa?  If Y, what is the retention period?  5 years or more  2 Confirm that all responses provided in the above Section are representative of all the LE's branches  52 a If N, clarify which questions the difference/a relate to and the branch/es that this applies to.  53 If appropriate, provide any additional information/context to the answers in this section.  53 If appropriate, provide any additional information/context to the answers in this section.  54 Obes the Entity's AMIL & CTF EVRA cover the inherent risk components detailed below.  54 a Cilient Yes  54 Contained Yes  54 Contained Yes  54 Contained Yes  55 Does the Entity's AMIL & CTF EVRA cover the controls of the contained of th	51		Va-
5 years or more  22 a Confirm that all responses provided in the above Section are representative of all the LE's branches are representative of all the LE's branches and the branch'se that this applies to the answers in this section.  23 If appropriate, provide any additional information/context to the answers in this section.  25 Author CE's SANCTIONS RISK ASSESSMENT  26 Client Components desired below:  26 Author Cellent Components desired below:  27 Author Cellent Components desired below:  28 Author Cellent Components desired below:  28 Author Cellent Components desired below:  29 Author Cellent Components desired below:  29 Author Cellent Cell			res
52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a and the branch'ses that this applies to.  53 If appropriate, provide any additional information/context to the answers in this section.  54 Does the Entity's AML & CIT E WARA cover the inherent risk components detailed below.  55 Control of the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  56 Does the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  55 Does the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  56 Le Channel Yes 57 Coustoner Due Disjence Yes 58 District of the Control of the Contr	51 a	If Y, what is the retention period?	
52 Confirm that all responses provided in the above Section are representative of all the LE's branches 52 a and the branch'ses that this applies to.  53 If appropriate, provide any additional information/context to the answers in this section.  54 Does the Entity's AML & CIT E WARA cover the inherent risk components detailed below.  55 Control of the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  56 Does the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  55 Does the Entity's AML & CIT E WARA cover the controls effectiveness components detailed below.  56 Le Channel Yes 57 Coustoner Due Disjence Yes 58 District of the Control of the Contr			5 years or more
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55 g Governance Yes 55 h Management Information Yes 56 Has the Entity's AML & CTF EWRA been completed in the last 12 months? 56 a If N, provide the date when the last AML & CTF EWRA was completed.  57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 a Client Yes 57 b Product Yes 57 c Channel Yes 57 d Geography Yes 58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes 58 b Governance Yes 58 c List Management Yes	EE f		
Management Information   Yes			
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57 Does the Entity's Sanctions EWRA cover the inherent risk components detailed below:  57 a Client Yes  57 b Product Yes  57 c Channel Yes  57 d Geography Yes  58 Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:  58 a Customer Due Diligence Yes  58 b Governance Yes  58 c List Management Yes	J0 a	the last 12 months?	Yes
risk components detailed below:   Yes	JOa	If N, provide the date when the last AML & CTF EWRA was completed.	
risk components detailed below:   Yes	JO a	If N, provide the date when the last AML & CTF EWRA was completed.	
risk components detailed below:   Yes	J0 d	If N, provide the date when the last AML & CTF EWRA was completed.	
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58 a         Customer Due Diligence         Yes           58 b         Governance         Yes           58 c         List Management         Yes	57 a 57 b 57 c 57 d	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 Yes Yes Yes
58 b         Governance         Yes           58 c         List Management         Yes	57 a 57 b 57 c	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	Yes Yes Yes Yes
58 c List Management Yes	57 57 a 57 b 57 c 57 d 58	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 Yes Yes Yes Yes Yes Yes
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www managaman minimum yes	57 a 57 b 57 c 57 d 58 a 58 b	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 Diligence Governance	Yes Yes Yes Yes Yes Yes Yes Yes Yes
	57 a 57 b 57 c 57 d 58 a 58 b 58 c	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 Diligence Governance List Management	Yes Yes Yes Yes Yes Yes Yes Yes Yes

40 d	contributions	Yes
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
42	Does the Entity provide mandatory ABC training to:	
42 42 a	Board and senior Committee Management	Yes
	1st Line of Defence	Yes
42 b		Yes
42 c	Zild Eille di Beleiles	Yes
42 d	The state of policinos	
42 e	subject to ABC risk have been outsourced	No
42 f	(contractors/consultants)	No
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes
44	Confirm that all responses provided in the above Section	
44	are representative of all the LE's branches	Yes
44 a	If N, clarify which questions the difference/s relate to	
44 d	and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5 AML C	CTF & SANCTIONS POLICIES & PROCEDURES	
46	Has the Entity documented policies and procedures	
	consistent with applicable AML, CTF & Sanctions	
	regulations and requirements to reasonably prevent,	
	detect and report:	· · · · · · · · · · · · · · · · · · ·
46 a	Money laundering	Yes
	Terrorist financing	Yes
46 b	Sanctions violations	Yes
46 c	Are the Entity's policies and procedures updated at least	
47	annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	Yes
48 a1	If Y, does the Entity retain a record of the results?	Yes
48 b	EU Standards	Yes
48 b1	If Y, does the Entity retain a record of the results?	Yes
49	Does the Entity have policies and procedures that:	
49 a	Prohibit the opening and keeping of anonymous and	Yes
49 b	fictitious named accounts Prohibit the opening and keeping of accounts for	Yes
49 c	unlicensed banks and/or NBFIs  Prohibit dealing with other entities that provide banking	Yes
	services to unlicensed banks	
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchange houses, casa de cambio, bureaux de change or money transfer agents	yes

00	Cupations Activity Deposition	
22 m 22 n	Suspicious Activity Reporting Training and Education	Yes Yes
22 O	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML.	
	CTF & Sanctions Compliance Department?	11-100
24	Is the Entity's AML, CTF & Sanctions policy approved at	
	least annually by the Board or equivalent Senior	Yes
	Management Committee? If N, describe your practice in Question 29.	
25		
20	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions	Yes
	programme?	165
26	Does the Entity use third parties to carry out any	
	components of its AML, CTF & Sanctions programme?	No
26 a	If Y, provide further details	
	, provide farities detaile	
27	Does the entity have a whistleblower policy?	Yes
28	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.	
29	If appropriate, provide any additional information/context	
	to the answers in this section.	
4. ANTI B	RIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures	
	consistent with applicable ABC regulations and	
	requirements to reasonably prevent, detect and report	Yes
	bribery and corruption?	
31	Does the Entity have an enterprise wide programme that	Yes
32	sets minimum ABC standards?	
J2	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for	Voc
	coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate	
-	levels of experience/expertise to implement the ABC	Yes
	programme?	
34	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35	Does the Entity have a global ABC policy that:	· · · · · · · · · · · · · · · · · · ·
35 a	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	Yes
	advantage	
35 b	Includes enhanced requirements regarding interaction	
	with public officials?	Yes
35 с	Includes a prohibition against the falsification of books	
	and records (this may be within the ABC policy or any	l
	other policy applicable to the Legal Entity)?	Yes
36	Does the Entity have controls in place to monitor the	
	effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular	V.
	reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment	
	(EWRA) been completed in the last 12 months?	Yes
88 a	If N, provide the date when the last ABC EWRA was	
	completed.	
19	Does the Entity have an ABC residual risk rating that is	
	the net result of the controls effectiveness and the	Yes
	inherent risk assessment?	
10	Does the Entity's ABC EWRA cover the inherent risk	
	components detailed below:  Potential liability created by intermediaries and other	
0.0	rutential lianuty created by intermediaries and other	Yes
0 a		169
	third-party providers as appropriate	165
0 a 0 b	third-party providers as appropriate  Corruption risks associated with the countries and	
	third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or	
	third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	
0 ь	third-party providers as appropriate  Corruption risks associated with the countries and industries in which the Entity does business, directly or	Yes

19 a1i	Does the Entity have processes and procedures in	
15 411	place to identify downstream relationships with MSBs /MVTSs/PSPs?	Yes :
19 b	Cross-Border Bulk Cash Delivery	No
19 c		Yes
		No
19 d	Domocao Baix Sueri E anti-	
19 e	Hold Mail	No
19 f	International outsides	
19 g	ESTA LINE COSTILIES	No
19 h	i dyddio i i i odgii i teecante	No
19 i	Payment services to non-bank entities who may then offer third party payment services to their customers?	No
19 i1	If Y , please select all that apply below?	
19 i2	Third Party Payment Service Providers	No
19 i3	Virtually loods Scittle 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	No
19 i4	eCommerce Platforms	No
19 i5	Other - Please explain	
19 j	Private Banking	Both
	Remote Deposit Capture (RDC)	No
19 k	Sponsoring Private ATMs	No
19 1		No .
19 m	Stored Value Instruments	
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
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:	No
19 p1	Check cashing service	NO Discours (Alateres in ed.)
19 p1a	If yes, state the applicable level of due diligence	No Due Diligence (Not required)
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	Due Diligence
	Foreign currency conversion	No
19 p3	If yes, state the applicable level of due diligence	
19 p3a		
19 p4	Sale of Monetary Instruments	No
19 p4a	If yes, state the applicable level of due diligence	No Due Diligence (Not required)
19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	For 19 p2A: Only local currency wires are allowed. Customer identification and verification are performed prior to transactions. Ids are checked and name screening conducted through Sanctions Monitoring Program "Paygate Inspector". Transactions are monitored through AML monitoring program "Paygate Analyzer" with specific scenarios. IDs are kept for 8 years as per local regulation.
19 q	Other high-risk products and services identified by the Entity (please specify)	a. Wire transfers     b.Collection of the Personal Checks Drawn on Foreign Banks     c. Banking channels (i.e. Mobile,internet) allowing non-face-to-face transactions     d. Private banking products and services
20	Confirm that all responses provided in the above Section are representative of all the LE's branches.	Yes
20 a	If N. clarify which questions the difference/s relate to	
20 a	and the branch/es that this applies to.	
21	If appropriate, provide any additional information/context to the answers in this section.	Business relationships with the request of collection of personal checks drawn on foreign banks in foreign currency should be avoided. The service of collection or purchase of cheques in forign currency should only be provided to companies and persons with long history of business.
2 4881	TE & CANCTIONS PROCESSES	
3. AML, C 22	TF & SANCTIONS PROGRAMME  Does the Entity have a programme that sets minimum  AML, CTF and Sanctions standards regarding the following components:	
22	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
22 22 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
22 a 22 b	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening	Yes Yes
22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership	Yes Yes
22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Yes
22 a 22 b 22 c	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting	Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD	Yes Yes Yes Yes Yes Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening Beneficial Ownership Cash Reporting CDD EDD Independent Testing Periodic Review Policies and Procedures PEP Screening	Yes
22 a 22 b 22 c 22 d 22 e 22 f 22 g 22 h 22 i	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:  Appointed Officer with sufficient experience/expertise Adverse Information Screening  Beneficial Ownership  Cash Reporting  CDD  EDD  Independent Testing  Periodic Review  Policies and Procedures	Yes

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	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
131	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.	
132	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)

KUVEYT TÜRK KATILIM BANKASI A.Ş.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

I, ZEYNEP YAŞAR, Head of Financial Institution Department, 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.

I, HAYRETTIN ÇAPOĞLU, Heed of Compliance Department, 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 yar authorised to execute this declaration on behalf of the Financial Institution.

13.11. 2024 (Signature & Date)

(Signature & Date) 13 : //. 2025