

## Anti-Money Laundering (AML) / Know Your Customer (KYC) Questionnaire

### I. General Information

1. Legal Name of Financial Institution (FI) : **GSD Yatırım Bankası A.Ş.**
2. Registered Office Address : **Aydınevler Mah. Kaptan Rifat Sk. No:3 GSD Building, Kucukyali/Istanbul/TURKEY**
3. Commercial Registration: **410445**
4. Tax Identification No: **4110082280**
5. Banking Licence Number/Date of Issue: **B.02.1.HM.0.BAK.02.04/5222/658-13145, FEB 24,1999**
6. **Contact Details**  
Officer Responsible for Account relationship: **Nalan OZMAT**  
Contact Telephone: **+90 216 5879000 (Ext:113)**  
Email address: **nozmat@gsdbank.com.tr**

### II. Ownership Structure

1. Is your Financial Institution publicly owned?  Yes  No
2. Is your Financial Institution listed on any stock exchange?  
If "YES", which one(s)?  Yes  No
3. If "NO", please provide a list of the beneficial owners, who own, control or have power to vote for 20 pct or more of any class of voting shares; or of the 10 largest shareholders, if no owner has greater than 20 pct.  
**99.99 % owned by GSD Holding Co.**
4. List names and positions of the members of the Board of Directors:

<u>Name</u>	<u>Title</u>	<u>Country of Domicile</u>
<b>Akgun TURER</b>	<b>Chairman</b>	<b>Turkey</b>
<b>Ismail Suhan OZKAN</b>	<b>Deputy Chairman</b>	<b>Turkey</b>
<b>M.Sedat OZKANLI</b>	<b>Member</b>	<b>Turkey</b>
<b>Cezmi OZTURK</b>	<b>Member</b>	<b>Turkey</b>
<b>Engin KAM</b>	<b>Member and General Manager</b>	<b>Turkey</b>

### III. Regulatory Information

1. Please identify the regulatory authority that supervises your FI : **Banking Regulation and Supervision Agency (BRSA – BDDK) and Financial Crimes Investigation Board (MASAK) of Türkiye**
2. Has your country established laws designed to prevent Money Laundering and terrorist financing activities?  Yes  No
3. Does your FI adhere to the Anti-Money Laundering and special terrorist financing recommendations developed by the Financial Action Task Force (FATF)?  Yes  No
4. Has your FI been reviewed by any government authority for compliance with Anti-Money Laundering laws and regulations in the last five years?  
If "YES", please explain the reason and by which government authority?  Yes  No

Without any exception, Banking Regulation and Supervision Agency (BDDK) regularly reviews the Anti-Money Laundering and Know Your Customer procedures and policies of all the banks operating in Turkey.

**IV. General AML Policies, Practices and Procedures**

- |     |   |  |                                    |
|-----|---|--|------------------------------------|
| 1.  | Is the AML compliance program approved by the FI's board or a senior committee?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 2.  | Does the FI have a legal and regulatory compliance program that includes a designated officer, who is responsible for coordinating and overseeing the AML framework?<br><br>If "YES" please provide the following:<br><b>Name: Emre DUZ</b><br><b>Title: Head of Internal Control and Compliance Officer</b><br><b>Address: Aydınevler Mah. Kaptan Rifat Sk. No:3 GSD Building, Kucukyali/Istanbul/TURKEY</b><br><b>e-mail: eduz@gsdbank.com.tr</b> | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 3.  | Has the FI developed written policies documenting the processes that are in place to prevent, detect and report suspicious transactions?<br>If "NO", when does your FI plan to introduce it? .....  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 4.  | In addition to inspections by the government supervisors/regulators, does the FI have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 5.  | Does the FI have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group and which is not subject to inspection by the respective banking authorities.)   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 6.  | Does the FI prohibit financial services to banks operating under an offshore banking license?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 7.  | Does the FI policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 8.  | Does the FI have policies covering relationships with Politically Exposed Person (PEP's), their family and close associates?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 9.  | Does the FI have record retention procedures that comply with applicable laws?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 10. | Are the FI's AML policies and practices being applied to all branches and subsidiaries of the FI both in the home country and in locations outside of that jurisdiction?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
| 11. | Does the FI adhere to the Wolfsberg Transparency Principles   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |

and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?

## V. Know Your Customer, Due Diligence and Enhanced Due Diligence

---

- |    |   |  |   |
|----|---|--|---|
| 1. | Has the FI implemented processes for the identification of those customers, on whose behalf it maintains or operates accounts or conducts transactions?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 2. | Does the FI have a requirement to collect information regarding its customers' business activities?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 3. | Does the FI assess its FI customers' AML policies or practices?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 4. | Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 5. | Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 6. | Does the FI have a risk-based assessment of its customer base and their transactions?   | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 7. | Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI? | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 8. | Does the FI provide payable through accounts* to correspondent Banks?   | <input type="checkbox"/> <b>Yes</b>            | <input checked="" type="checkbox"/> <b>No</b> |

## VI. AML Training

---

- |    |   |  |   |
|----|---|--|---|
| 1. | Does your institution provide employee-training program for prevention of money laundering and terrorist financing requiring all staff to undertake training? | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 2. | Does the FI retain records of its training sessions including attendance records and relevant training materials used?  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 3. | Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?                                  | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b>            |
| 4. | Does the FI employ third parties to carry out some of the functions of the FI?  | <input type="checkbox"/> <b>Yes</b>            | <input checked="" type="checkbox"/> <b>No</b> |

## VII. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

---

- |    |   |  |                                    |
|----|---|--|------------------------------------|
| 1. | Does the FI have policies or practices for the identification and reporting of transactions that are required to be | <input checked="" type="checkbox"/> <b>Yes</b> | <input type="checkbox"/> <b>No</b> |
|----|---|--|------------------------------------|

reported to the authorities?

2. Does the FI retain records of its training sessions including attendance records and relevant training materials used?



Yes



No

**I, on behalf of "GSD Yatırım Bankası A.Ş." confirm that, I am authorized to complete and sign this document and the above information is accurate, complete and correct in all material respects and contains no untrue or misleading statement and reflective of our Financial Institution's Anti-Money Laundering and Know Your Customers policies, procedures and program.**

**Place and Date** : Istanbul, March 25, 2019

**Full Name** : Mr. Emre DUZ

**Title** : Compliance Officer

**Signature** :



- 
- For the purpose of the Questionnaire, "physical presence" means a place of business located at a fixed address, in a country in which the bank is authorized to conduct banking activities; and where the bank employs individuals full time and maintains operating records related to banking activities; and where the bank is subject to inspection by the respective banking authority, which licensed the bank to conduct banking activities.
  - **\*Payable Through Account:** The customers of the Financial Institutions or other third parties have direct access to the services provided under the correspondent banking relationship.