



Scope: Modeling And Design Of Jewelry With Gold, Silver Precious Metals And Precious Stones (Diamonds), Production, Sale And Export

Our compliance program is crafted to align with specific legal frameworks and their applicable secondary regulations, emphasizing a comprehensive approach to legal adherence and ethical conduct. At Sözer Kuyumculuk we're dedicated to maintaining an unwavering commitment to the highest standards of compliance, including laws on the prevention of laundering proceeds of crime, combating terrorism financing, and preventing the financing of proliferation of weapons of mass destruction, as well as adhering to internationally recognized Customer Identification (KYC) policies.

This document outlines Sözer Kuyumculuk's compliance program, aligned with the following legal frameworks and their applicable secondary regulations:

- **Law No. 5549** on the Prevention of Laundering Proceeds of Crime
- **Law No. 6415** on the Prevention of Financing of Terrorism
- **Law No. 7262** on the Prevention of Financing the Proliferation of Weapons of Mass Destruction
- **Customer Identification (KYC)** Policy and related group procedures prepared in compliance with international standards.

Risk-Based Approach

Acknowledging that laundering and financing activities can manifest in various forms across different sectors, our compliance program adopts a risk-based approach. This methodology facilitates the identification and assessment of potential laundering risks specific to our field of operation, guiding the determination and implementation of effective methods to mitigate and control these risks.

Implementation Procedures

Key components of our compliance program include:

- **Policy and Procedure Development:** Establishing corporate policies and procedures reflecting national risk assessments.
- **Risk Management:** Engaging in proactive risk management activities.
- **Monitoring and Control:** Implementing continuous monitoring and control measures.
- **Compliance Leadership:** Appointing a compliance officer and establishing a dedicated compliance unit.
- **Training:** Organizing regular training sessions for staff.
- **Internal Audits:** Conducting comprehensive internal audits.
- **Reporting and Record-Keeping:** Fulfilling all reporting and record-keeping obligations.
- **Customer Due Diligence:** Adhering to stringent KYC principles, including customer due diligence.
- **Information Sharing:** Facilitating the sharing of account and transaction information within the financial group.

Responsibility and Review

The Board of Directors is ultimately responsible for the effective, adequate, and appropriate implementation of the compliance program. All staff members are obligated to adhere to the program's requirements. Our corporate policies and procedures are periodically reviewed, with any updates promptly communicated to staff members.

Purpose

The purpose of this directive is to ensure compliance with the framework for establishing Regulatory Compliance standards in line with the "Procedures and Principles Regarding the Freezing of Assets and Removal of Such Decisions" regulations, as it pertains to Sözer Kuyumculuk.

Responsibility and Authority

- **General Manager's Responsibility:** The General Manager is responsible for the implementation of this directive.
- **Review and Update:** The General Manager is responsible for the periodic review and updating of this directive to ensure compliance with current laws and regulations.
- **Unit Managers and Employee Compliance:** Relevant Unit Managers are responsible for ensuring all employees are fully informed about and comply with this directive.



Implementation

In compliance with the fight against the financing of terrorism and the financing of the proliferation of weapons of mass destruction, the following procedures are implemented in line with the "Procedures and Principles Regarding the Freezing of Assets and Removal of Such Decisions":

- Transaction Service Review: a) For ongoing precious metal sales transactions, precious metals are not delivered to the buyer if payment has been made. Furthermore, collected amounts, whether in cash or credit, are not refunded. b) For incomplete purchase transactions, precious metals not paid for but provided are not returned to the seller.
- BIST Precious Metals and Gemstones Market Transactions: If transactions involve the BIST Precious Metals and Gemstones Market, exchange authorities are immediately informed, and the assets of the relevant parties are frozen immediately.
- Ministry Notifications: All notifications from the Ministry are responded to immediately upon completion of asset freezing operations and within a maximum of 7 days in the method they were received.
- Situations of Non-Existent or Unrecordable Assets: Individuals with no assets with us or whose assets cannot be recorded are reported to the Ministry with their identity information indicating their situation.
- Asset Freezing Decisions: Information of those with frozen assets is documented and reported to the Ministry.
- Instructions for Lifting the Asset Freezing Decision: The operation conducted following the Ministry's instructions to lift the asset freezing decision is reported to the Ministry.

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Sözer Kuyumculuk Sanayi ve Ticaret Anonim Şirketi



PREPARED AND APPROVED BY SÖZER KUYUMCULUK BOARD OF DIRECTORS