

## COMPLIANCE STATEMENT

Fibabanka A.Ş., its branches, affiliate (hereinafter referred to as Fibabanka) are committed to cooperating with law enforcement and regulatory agencies to fight against money laundering, terrorist financing, and other financial offences. The republic of Turkey is a member country of the Financial Action Task Force (FATF) and has enacted laws and regulations to combat money laundering, terrorist financing and other financial crimes in line with FATF standards. Fibabanka has adopted an Anti-Money Laundering Compliance Program that fulfills all requirements of *Law No. 5549 on Prevention of Laundering Proceeds of Crime* and *Law No. 6415 on the Prevention of the Financing of Terrorism* issued by Turkish Financial Crimes Investigation Board.

This program includes following;

- ◆ Establishing and implementing of policies, procedures and internal controls reasonably designed to achieve compliance with AML/CFT regulations, FATF standards and sanctions enforced by EU, UN and OFAC,
- ◆ Assigning a compliance officer responsible for implementing anti-money laundering and counter terrorist financing policies and procedures,
- ◆ Monitoring and auditing customer activities and transactions as per AML/CFT legislations and regulations,
- ◆ Prohibiting accounts /relationships with shell banks,
- ◆ Reporting suspicious transactions,
- ◆ Training of employees on AML/CFT,
- ◆ An audit and review function to test the efficiency and sufficiency of whole compliance program.

Audit Committee has the overall responsibility for ensuring compliance with the AML program, but all staff of Fibabanka has a duty in respect of compliance. Therefore, the mitigation of any compliance risk is a shared responsibility in Fibabanka.