

FINANCIAL CRIME POLICY

Purpose & Scope

Odea Bank Anonim Şirketi (hereinafter referred to as “Odeabank” or the “Bank”) is committed to combating all financial crimes, including but not limited to **money laundering, terrorist financing, financing of the proliferation of weapons of mass destruction, bribery and corruption, fraud, and tax evasion**. The Bank is determined to prevent its products and services from being misused for criminal activities. Accordingly, it implements a risk-based compliance program aimed at identifying, mitigating, and managing financial crime risks. This Bank Policy has been established to reflect the Bank’s commitment to combating financial crimes and to define the necessary procedures and rules for managing financial crime risks. The Policy is binding for all Bank employees, head office departments, and branches.

Governance

The establishment of a strong compliance culture within the Bank is of paramount importance. The Board of Directors and senior management provide full support in this regard. The Board ensures the approval of institutional policies, allocation of adequate resources and systems, and effective implementation of the program. The senior management is responsible for overseeing the proper implementation of the compliance program. To ensure independence, a dedicated Compliance Unit and a Compliance Officer have been appointed. The Compliance Officer reports directly to the Audit Committee of the Board of Directors, ensuring that the Bank’s activities remain aligned with regulatory and policy requirements. In line with this structure, the Bank fosters a strong compliance culture that is consistently demonstrated at all levels of the organization.

Obligations

Our Bank operates in full compliance with all applicable legal regulations, including “**Law No. 5549 on the Prevention of Laundering of Proceeds of Crime**” and “**Law No. 6415 on the Prevention of the Financing of Terrorism**”, as well as the regulations of the Financial Crimes Investigation Board (MASAK). Additionally, our compliance program adheres to the recommendations of the Financial Action Task Force (FATF) and aligns with internationally recognized standards and best practices. In this context, the key components of our Bank’s compliance program are as follows:

- Establishing written institutional policies and procedures aimed at preventing money laundering and the financing of terrorism;
- Implementing a risk management system and a risk-based approach that includes enhanced due diligence measures for high-risk customers and transactions, as well as the application of advanced detection mechanisms to identify and mitigate potential risks;

- Maintaining monitoring and control mechanisms to track customer transactions and behaviors in relation to financial crime risk indicators, identifying and investigating suspicious activities, and reporting suspicious transactions to MASAK;
- Conducting mandatory financial crime training for all employees, tailored to their roles and responsibilities, as well as providing additional training activities for specific teams as needed;
- Regularly assessing the Bank's compliance program, financial crime risk management policies, controls, and procedures through independent internal and external audits

Risk Management

Our Bank adopts a risk-based approach to effectively manage the risks associated with money laundering and terrorist financing. In this context, Know Your Customer (KYC) measures are applied to verify customer identity, identify beneficial owners, and understand the purpose of the business relationship. Customers, products, and transactions are categorized into risk levels (low, medium, and high). Enhanced due diligence (EDD) measures are implemented for high-risk customers and transactions, requiring additional steps and senior management approval where necessary.

Our Bank does not establish business relationships with individuals or entities whose identities cannot be verified, whose purpose of the relationship is unclear, or who are listed on national or international sanctions lists due to their connection to illegal activities. Specific customer groups, such as politically exposed persons (PEPs), undergo enhanced due diligence (EDD), including stricter verification measures compared to regular customers. Additionally, customer records are regularly updated to maintain an accurate customer risk profile.

Monitoring and Control Activities

Our Bank continuously monitors customers and transactions through surveillance processes to identify unusual or potentially suspicious activities. To achieve this, advanced control systems, automated monitoring applications, and alert mechanisms are used to track transactions in accordance with customer risk profiles. Suspicious transactions and activities are reviewed by the Compliance Unit and, if deemed necessary, are reported to MASAK through a Suspicious Transaction Report (STR). Additionally, the Bank regularly screens customers and transactions against up-to-date sanction lists using automated tools. Furthermore, internal control and compliance processes, policies, and procedures are regularly reviewed and updated to ensure continuous improvement.

Internal Audit

The Internal Audit Unit of our Bank conducts independent audits of the compliance program at least once a year. These audits assess whether compliance policies and procedures are effectively implemented and whether controls are functioning properly. The findings from internal audits are reported to the Audit Committee of the Board of Directors. Any deficiencies, weaknesses, or areas

for improvement identified during the audit are addressed through appropriate actions and corrective measures. Thus, the effectiveness of our compliance program is continuously enhanced, and our Bank's resilience against risks is strengthened.

Training

Our Bank conducts comprehensive training programs to enhance employees' awareness and expertise in financial crime compliance. All new employees are required to complete fundamental compliance training on the Bank's compliance policies and procedures upon joining. Additionally, all employees must participate in mandatory annual training, which is closely monitored by the Compliance Unit to ensure completion. These training sessions cover topics such as money laundering and terrorist financing risks, suspicious transaction identification, customer due diligence (CDD) procedures, and regulatory changes.

In addition to internal training, specialized training sessions are organized for specific departments, such as employees in high-risk areas or compliance professionals who require advanced-level training. To keep staff informed and up to date with industry trends, employees are encouraged to participate in sectoral conferences, seminars, and webinars. Furthermore, the Compliance Unit actively engages in industry-wide working groups to share insights and ensure the integration of new regulatory developments into the Bank's operations. All training activities are documented, and employees' completion of these programs is closely monitored.

Policy Updates

The Bank Policy on the Prevention of Money Laundering and the Financing of Terrorism is regularly updated to reflect changes in legislation and newly emerging risks. The policy content and operational procedures are reviewed at least once a year and updated when necessary. Changes in regulations, new MASAK guidelines, and global developments in financial crime compliance are continuously monitored, and necessary adjustments are made to the Bank's policies. Updates are officially approved, and all relevant stakeholders are informed accordingly. This approach ensures that the Bank's policy and compliance program remain up to date, effective, and fully aligned with legal requirements.

Policy Ownership

The Compliance Unit is the institutional owner of this policy, which has been approved by the Board of Directors and enacted accordingly. The Compliance Unit is responsible for ensuring the implementation, updating, and internal distribution of the policy. The Board of Directors holds the ultimate responsibility for adopting and overseeing the effective implementation of this policy and the compliance program. All bank employees are expected to adhere to this policy and comply with the principles set forth in the compliance program. They are also responsible for integrating policy requirements into their daily activities. Accountability and responsibility for compliance apply at all levels of the Bank, starting from senior management.