# the Wolfsberg Group

Financial Institution Name: Location (Country) :

D YATIRIM BANKASI A.S. 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. If 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.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	Allswer
1	Full Legal Name	
		D YATIRIM BANKASI A.S.
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	KUSTEPE MAH. MECIDIYEKOY YOLU CAD. TRUMP TOWER APT NO: 12/32 34387 SISLI/ISTANBUL
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	24.06.2020
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
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	DOGAN SIRKETLER GRUBU HOLDING A.S. 90,99 %
7	% of the Entity's total shares composed of bearer shares	0
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	no
10	Name of primary financial regulator/supervisory authority	BANKING REGULATION AND SUPERVISION AGENCY (BRSA) FINANCIAL CRIMES INVESTIGATION BOARD (FCIB)
11	Provide Legal Entity Identifier (LEI) if available	7890006594UCFDHT1U38
	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	DOGAN SIRKETLER GRUBU HOLDING A.S. 90,99 %
13		TURKIYE
14	Select the business areas applicable to the Entity	
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14 a		
CONTRACTOR OF THE PARTY OF THE	Retail Banking	No
14 b	Private Banking	No
14 c	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	
14 i	Multilateral Development Bank	No
14 j	Wealth Management	No
14 k	Other (please explain)	No
14 K	Other (please explain)	
15	Does the Entity have a significant (10% or more) portfolio of non-resident customers or does it derive more than	
	10% of its revenue from non-resident customers? (Non-	L
	resident means customers primarily resident in a	No
	different jurisdiction to the location where bank services	
	are provided)	
15 a	If Y, provide the top five countries where the non-	
C81 554	resident customers are located.	
	resident editioners are located.	
<u> 2004 ya na </u>		
16	Select the closest value:	5975445 (Wisseld Street)
16 a	Number of employees	51-200
16 b	Total Assets	
17	Confirm that all responses provided in the above Section	Between \$100 and \$500 million
	or representative of all the LEL to	No branches
	, and a second s	No branches
17 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	l .	
18	If appropriate, provide any additional information/context	
18	If appropriate, provide any additional information/context to the answers in this section.	
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2. PRODI	UCTS & SERVICES  Does the Entity offer the following products and services:	No.
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2. PRODI	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y	No
2. PRODI 19 19 a 19 a	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking	No
2. PRODI 19 19 a 19 a 19 a1 19 a1a	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?	No
2. PRODI 19 19 a 19 a	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to	No
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?	No
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2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No -
2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses	No
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2. PRODI 19 19 a 19 a1 19 a1a 19 a1b 19 a1c 19 a1d 19 a1e 19 a1f 19 a1g	to the answers in this section.  UCTS & SERVICES  Does the Entity offer the following products and services:  Correspondent Banking  If Y  Does the Entity offer Correspondent Banking services to domestic banks?  Does the Entity allow domestic bank clients to provide downstream relationships?  Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?  Does the Entity offer Correspondent Banking services to foreign banks?  Does the Entity allow downstream relationships with foreign banks?  Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?  Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?  Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	No
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19 a1i	Does the Entity have processes and procedures in	
	place to identify downstream relationships with MSBs	
	/MVTSs/PSPs?	
19 b	Cross-Border Bulk Cash Delivery	No
19 c	Cross-Border Remittances	Yes
19 d	Domestic Bulk Cash Delivery	No
19 e	Hold Mail	No
19 f	International Cash Letter	No No
19 g	Low Price Securities	No
19 h	Payable Through Accounts	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?	CONTROL OF THE PROPERTY OF THE
19 i2	Third Party Payment Service Providers	。 1985年,我们是在大学的工作,就是在大学的工作,就是一个大学的工作,就是一个大学的工作,就是一个大学的工作,就是一个大学的人,也不是一个大学的工作,就是一个大
19 i3	Virtual Asset Service Providers (VASPs)	
19 i4	eCommerce Platforms	
19 i5	Other - Please explain	
40 :	D	
19 j	Private Banking	No
19 k	Remote Deposit Capture (RDC)	No
19	Sponsoring Private ATMs	No
19 m	Stored Value Instruments	No
19 n	Trade Finance	Yes
19 o	Virtual Assets	No
19 p	For each of the following please state whether you	
0.70.87	offer the service to walk-in customers and if so, the	
	applicable level of due diligence:	
19 p1	Check cashing service	The production of the state of
		No
19 p1a	If yes, state the applicable level of due diligence	
19 p2	Wire transfers	No
19 p2a	If yes, state the applicable level of due diligence	
19 p3	Foreign currency conversion	No
19 p3a	If yes, state the applicable level of due diligence	
19 p4	Sale of Monetary Instruments	No
40 = 4-	If yes, state the applicable level of due diligence	
19 p4a		
19 p4a 19 p5		
19 p4a 19 p5	If you offer other services to walk-in customers	
	If you offer other services to walk-in customers please provide more detail here, including describing	
	If you offer other services to walk-in customers	
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19 p5	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.	
	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the	
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19 p5 19 q 20	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  Confirm that all responses provided in the above Section are representative of all the LE's branches.	No branches
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19 p5  19 q  20  20 a  21  3. AML, C7	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.	No branches
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19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b  22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b  22 c	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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 Yes Yes
19 p5  19 q  20  20 a  21  3. AML, C7  22  22 a  22 b  22 c  22 d	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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 Yes
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 c  22 f	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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  Independent Testing  Periodic Review	Yes
19 p5  19 q  20  20 a  21  3. AML, CT  22  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 c  22 c  22 f  22 g  22 i  22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 d  22 e  22 f  22 g  22 h  22 i  22 j  22 k	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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  Risk Assessment	Yes
19 p5  19 q  20  20 a  21  22 a  22 b  22 c  22 c  22 c  22 f  22 g  22 i  22 j	If you offer other services to walk-in customers please provide more detail here, including describing the level of due diligence.  Other high-risk products and services identified by the Entity (please specify)  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 to the answers in this section.  TF & SANCTIONS PROGRAMME  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

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27 No. Supplication Analytic Regional by Trees 28 Or Trees Agreement Nationary 29 How many full time employees are in the Entity's ANAL 20 The Agreement Regional Compliance of the Compliance o			
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Room many full time employees and in the lettings ANUL.	_		
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involve state-owned or state-controlled entities or Yes		Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes
	40 c	involve state-owned or state-controlled entities or	Yes



	Wolfsberg Group Co	orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political 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:	FORCESTAN CONTROL OF THE STATE
42 a	Board and senior Committee Management	Yes
42 b	1st Line of Defence	Yes
42 c	2nd Line of Defence	Yes
42 d	3rd Line of Defence	Yes
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable
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 are representative of all the LE's branches	No branches
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
45	If appropriate, provide any additional information/context to the answers in this section.	
5. AML,	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
46 b	Terrorist financing	Yes
46 c	Sanctions violations	Yes
47	Are the Entity's policies and procedures updated at least annually?	Yes
48	Has the Entity chosen to compare its policies and procedures against:	
48 a	U.S. Standards	No
48 a1	If Y, does the Entity retain a record of the results?	
48 b	EU Standards	No
48 b1	If Y, does the Entity retain a record of the results?	
49 49 a	Does the Entity have policies and procedures that:  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 services to unlicensed banks	Yes
49 d	Prohibit accounts/relationships with shell banks	Yes
49 e	Prohibit dealing with another entity that provides	
49 f	services to shell banks  Prohibit opening and keeping of accounts for Section	Yes
	311 designated entities	Yes
49 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Yes
49 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes

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	Tronsperg Group C	orrespondent banking due diligence Questionnaire (CBDDQ) V1.4
49 i	Define the process for escalating financial crime risk	V
	issues/potentially suspicious activity identified by employees	Yes
49 j	Define the process, where appropriate, for terminating existing customer relationships due to financial crime risk	Yes
49 k	Define the process for exiting clients for financial crime reasons that applies across the entity, including foreign branches and affiliates	Yes
49	Define the process and controls to identify and handle customers that were previously exited for financial crime reasons if they seek to re-establish a relationship	Yes
49 m	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes
49 n	Outline the processes for the maintenance of internal "watchlists"	Yes
50	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	Yes
51	Does the Entity have record retention procedures that comply with applicable laws?	Yes
51 a	If Y, what is the retention period?	5 years or more
52	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
52 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
53	If appropriate, provide any additional information/context to the answers in this section.	
6. AML. CT	TF & SANCTIONS RISK ASSESSMENT	
54	Does the Entity's AML & CTF EWRA cover the inherent risk components detailed below:	
54 a	Client	Yes
54 b	Product	Yes
54 c	Channel	Yes
54 d	Geography	Yes
55	Does the Entity's AML & CTF EWRA cover the controls effectiveness components detailed below:	
55 a	Transaction Monitoring	Yes
55 b	Customer Due Diligence	Yes
55 c	PEP Identification	Yes
55 d 55 e	Transaction Screening Name Screening against Adverse Media/Negative	Yes Yes
	News	· ·
55 f	Training and Education	Yes
55 g	Governance Management Information	Yes
55 h 56	Management Information  Has the Entity's AML & CTF EWRA been completed in the last 12 months?	Yes Yes
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		Yes
57 a 57 b	risk components detailed below:	Yes Yes
57 a 57 b 57 c	risk components detailed below:  Client  Product	
57 a 57 b 57 c	risk components detailed below:  Client  Product  Channel	Yes Yes
57 a 57 b 57 c 57 d 58	risk components detailed below:  Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below:	Yes
57 a 57 b 57 c 57 d 58	risk components detailed below:  Client Product Channel Geography Does the Entity's Sanctions EWRA cover the controls effectiveness components detailed below: Customer Due Diligence	Yes Yes Yes Yes
57 a 57 b 57 c 57 d 58 58 a 58 b	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
57 a 57 b 57 c 57 d	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



		orrespondent banking Due Diligence Questionnaire (CBDDQ) V1.4
58 e	Name Screening	Yes
58 f	Transaction Screening	Yes
58 g	Training and Education	Yes
59	Has the Entity's Sanctions EWRA been completed in the	
40 CO.	last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA	
	was completed.	
60	Confirm that all responses provided in the above Section	No branches
	are representative of all the LE's branches	no branches
60 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context	
٠.	to the answers in this section.	
	to the diswers in this section.	
7. KYC, C	DDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when	
	CDD must be completed, e.g. at the time of onboarding	Yes
	or within 30 days?	
64	Which of the following does the Entity gather and retain	
A-3/30	when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
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?	
65 b	Authorised signatories (where applicable)	Yes Yes
65 c	Key controllers	
65 d	Other relevant parties	Yes
66	What is the Entity's minimum (lowest) threshold applied	Yes
	to beneficial ownership identification?	25%
67	Does the due diligence process result in customers	
	receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the	
or u	customer's risk classification? Select all that apply:	
67 a1	Product Usage	Voo
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes Yes
67 a6	Other (specify)	100
40	Strict (Specify)	
		Channel Risk
68	For high risk non-individual customers, is a site visit a	
	part of your KYC process?	Yes
68 a	If Y, is this at:	
68 a1	Onboarding	Yes
68 a2	KYC renewal	Yes
68 a3	Trigger event	Yes
68 a4	Other	
68 a4a	If yes, please specify "Other"	
	. Jos, places apasity offici	
69	Does the Entity have a risk based approach to screening	
	customers for Adverse Media/Negative News?	Yes
		758924
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes
		4.5.7

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	Triange	IC.
69 a3 70	Trigger event	Yes
1000	What is the method used by the Entity to screen for Adverse Media/Negative News?	Automated
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	Yes
74 a2	1 – 2 years	No
74 a3	3 – 4 years	No
74 a4	5 years or more	No
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6	Other (Please specify)	
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	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d		EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g		Prohibited
76 h		EDD on risk-based approach
76 i		EDD on risk-based approach
76 j		EDD on risk-based approach
76 k		EDD on risk-based approach
76 I		Prohibited
76 m		EDD on risk-based approach
76 n 76 o		EDD on risk-based approach
76 p		EDD on risk-based approach
76 p		EDD on risk-based approach
76 r		EDD on risk-based approach Prohibited
76 s		
76 t		EDD on risk-based approach Prohibited
76 u		EDD on risk-based approach
76 v		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

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70 6		orrespondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
78 a 79	If Y indicate who provides the approval:	Both
13	Does the Entity have specific procedures for onboarding entities that handle client money such as lawyers,	
	accountants, consultants, real estate agents?	Yes
80	Does the Entity perform an additional control or quality	
10,000	review on clients subject to EDD?	Yes
81	Confirm that all responses provided in the above Section	
	are representative of all the LE's branches	No branches
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.	
		, ,
	TORING & REPORTING	
83	Does the Entity have risk based policies, procedures and	
	monitoring processes for the identification and reporting	Yes
84	of suspicious activity?  What is the method used by the Entity to monitor	
34	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?	Internal System
84 b1	If 'Vendor-sourced tool' or 'Both' selected, what is the	
	name of the vendor/tool?	
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	Yes
85 a	suspicious transactions?	163
00 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction	V
	reporting requirements?	Yes
86	Does the Entity have policies, procedures and	
	processes to review and escalate matters arising from	Yes
	the monitoring of customer transactions and activity?	
87	Does the Entity have a data quality management	
	programme to ensure that complete data for all	Yes
00	transactions are subject to monitoring?	
88	Does the Entity have processes in place to respond to	
	Request For Information (RFIs) from other entities in a timely manner?	Yes
89	Does the Entity have processes in place to send	
	Requests for Information (RFIs) to their customers in a	Yes
	timely manner?	
90	Confirm that all responses provided in the above Section	No branches
00 -	are representative of all the LE's branches	No branches
90 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to	
0.4		
91	If appropriate, provide any additional information/context	
	to the answers in this section.	
	NT TRANSPARENCY	
92	Does the Entity adhere to the Wolfsberg Group Payment	Υρς
	Transparency Standards?	

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00		Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
93	Does the Entity have policies, procedures and	
	processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	103
11		Regulation on Measures Regarding Prevention of Money Laundering Proceeds of Crime and Financing of Terorism-Article 24 (Wire Transfers)
93 c	If N, explain	
04	D	
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 are representative of all the LE's branches	No branches
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. SANO	CTIONS	
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 screening?	Automated
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	Paygate Inspector
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	What is the method used by the Entity?	Automated
105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to conditions agreed in 2	Yes
106	transactions are subject to sanctions screening?  Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
	passione delecting processes.	

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106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	All applicable sanctions list provided by Dowjones (FACTIVA) database.
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 No
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
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.	
THE RESERVE OF THE PARTY OF THE	ING & 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	It is a second s	
	is the above mandatory training provided to:	
112 a	Is the above mandatory training provided to :  Board and Senior Committee Management	Yes
112 a 112 b	Board and Senior Committee Management  1st Line of Defence	Yes Yes
112 b 112 c	Board and Senior Committee Management	Yes
112 b 112 c 112 d	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence	
112 b 112 c 112 d 112 e	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced	Yes Yes
112 b 112 c 112 d 112 e	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)	Yes Yes Yes Not Applicable
112 b 112 c 112 d 112 e	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high	Yes Yes Yes
112 b 112 c 112 d 112 e 112 f 113	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML,	Yes Yes Yes Yes Not Applicable
112 b 112 c 112 d 112 e 112 f 113	Board and Senior Committee Management  1st Line of Defence  2nd Line of Defence  3rd Line of Defence  Third parties to which specific FCC activities have been outsourced  Non-employed workers (contractors/consultants)  Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities?  Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes Yes Yes Yes Not Applicable Not Applicable



	Wolfsberg Group (	Correspondent Banking Due Diligence Questionnaire (CBDDQ) V1.4
115 a	If N, clarify which questions the difference/s relate to	
	and the branch/es that this applies to.	
	Arva	
116	If appropriate, provide any additional information/context	
	to the answers in this section.	
12. QUA	LITY 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	Yes
440	independent Audit function)?	
119	Confirm that all responses provided in the above Section	No branches
119 a	are representative of all the LE's branches	stationed
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
	and the branchies that this applies to.	
120	If appropriate provide and the	
120	If appropriate, provide any additional information/context to the answers in this section.	
	to the diswers in this section.	
do auni		
13. AUDI		
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	
	basis?	
122	How often is the Entity audited on its AML, CTF, ABC,	
	Fraud and Sanctions programme by the following:	
122 a	Internal Audit Department	Yearly
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
123 b	procedures	tedoto.
123 c	Enterprise Wide Risk Assessment Governance	Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes Yes
123 e	Name Screening & List Management	Yes
123 f	Reporting/Metrics & Management Information	Yes
123 g	Suspicious Activity Filing	Yes
123 h	Technology	Yes
123 i	Transaction Monitoring	Yes
123 j 123 k	Transaction Screening including for sanctions	Yes
123 K	Training & Education	Yes
1231	Other (specify)	
		i
124	Acceptance	
124	Are adverse findings from internal & external audit	
124	tracked to completion and assessed for adequacy and	Yes
	tracked to completion and assessed for adequacy and completeness?	Yes
124	tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section	Yes No branches
	tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section are representative of all the LE's branches	
125	tracked to completion and assessed for adequacy and completeness?  Confirm that all responses provided in the above section	
125	tracked to completion and assessed for adequacy and completeness?  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	
125	tracked to completion and assessed for adequacy and completeness?  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	
125 125 a	tracked to completion and assessed for adequacy and completeness?  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.	
125	tracked to completion and assessed for adequacy and completeness?  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	
125 125 a	tracked to completion and assessed for adequacy and completeness?  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.	
125 125 a	tracked to completion and assessed for adequacy and completeness?  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	
125 125 a 126	tracked to completion and assessed for adequacy and completeness?  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 to the answers in this section.	
125 125 a 126 14. FRAL	tracked to completion and assessed for adequacy and completeness?  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 to the answers in this section.	
125 125 a 126	tracked to completion and assessed for adequacy and completeness?  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 to the answers in this section.	
125 125 a 126 14. FRAL 127	tracked to completion and assessed for adequacy and completeness?  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 to the answers in this section.	No branches
125 125 a 126 14. FRAL	tracked to completion and assessed for adequacy and completeness?  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 to the answers in this section.	No branches

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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	No branches
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)

D YATIRIM BANKASI A.S. (Financial Institution name) 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

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.

ISIL GÜRBÜZ (Global Head of Correspondent Banking or equivalent), 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.

BAŞAK YILMAZ (MLRO or equivalent), 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.

19.12.2024 (Signature & Date)

19.12.2024 (Signature & Date)