

Anti-Money Laundering Questionnaire

Additional information can be supplied at the end of the questionnaire.

I. General Information

1. Legal Name of Financial Institution (FI) : **ICBC Turkey Bank A.S.**
2. Registered Office Address : **Maslak Mah. Dereboyu 2 Cad. No:13 34398 Sarıyer/Istanbul Türkiye**
3. Registration/License No : **224058**
4. Tax Identification No: **8360047728**
5. FATCA Status: **Reporting Model 1 FFI**
6. Global Intermediary Identification Number (GIIN): **TCYZRA.00000.LE.792**

II. Ownership Structure

1. Is your FI publicly owned? YES NO
2. Is your FI listed on any stock exchange? YES NO
If "YES", which one(s)?
Borsa İstanbul A.Ş. (BIST)
3. Please provide a list of the beneficial owners, who own, control or have power to vote for 10 pct or more of any class of voting shares; or of the 10 largest shareholders, if no owner has greater than 10 pct.
Industrial and Commercial Bank of China Limited (ICBC); 92,817 pct
Borsa İstanbul A.Ş. (BIST); 7,183 pct

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? YES NO
If "YES", please explain the reason and by which government authority?
Without any exception, Banking Regulation and Supervision Agency and Financial Crimes Investigation Board regularly review the Anti-Money Laundering and Know Your Customer procedures and policies of all the banks operating in Türkiye.

5. Has your institution ever been subject to supervisory or criminal punishment caused by AML and CTF matters? If yes, please provide reason analyses, measures taken to compensate and the effects. YES NO ✓

IV. General AML Policies, Practices and Procedures

- 1. Is the AML compliance program approved by the FI's board or a senior committee? YES ✓ NO
- 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? YES ✓ NO
- 3. Does your institution have specially designated department and staff responsible for coordinating and overseeing the AML program? YES ✓ NO
- 4. Has the FI developed written policies documenting the processes that are in place to prevent, detect and report suspicious transactions? YES ✓ NO
If "NO", when does your FI plan to introduce it?
- 5. 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? YES ✓ NO
- 6. 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.) YES ✓ NO
- 7. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products? YES ✓ NO
- 8. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates? YES ✓ NO
- 9. Does the FI have record retention procedures that comply with applicable laws? YES ✓ NO
10 years
- 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? YES ✓ NO

V. Risk Assessment



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| 1. | Does the FI have a risk-based assessment of its customer base and their transactions? | YES ✓ | NO |
| 2. | 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? | YES ✓ | NO |
| 3. | Does your institution take measures to identify customers when they use electronic banking services like Telephone Banking, Internet Banking, ATM and other electronic service facilities? | YES ✓ | NO |

VI. Know Your Customer, Due Diligence and Enhanced Due Diligence

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| 1. | Has the FI implemented processes for the identification of those customers, on whose behalf it maintains or operates accounts or conducts transactions? | YES ✓ | NO |
| 2. | Does the FI have a requirement to collect information regarding its customers' business activities? | YES ✓ | NO |
| 3. | Does the FI assess its FI customers' AML policies or practices? | YES ✓ | NO |
| 4. | Does the FI have a process to review and, where appropriate, update customer information relating to high risk client information? | YES ✓ | NO |
| 5. | Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information? | YES ✓ | NO |
| 6. | Does the FI provide payable through accounts* to correspondent banks? | YES | NO ✓ |

If "Yes",

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| a. | Does the FI perform adequate due diligence on third parties allowed to transact business on the accounts and ensure that the relevant customer identification data will be provided upon request. | YES | NO |
| b. | Please confirm that the account of the FI with ICBC Turkey –if any– is and will not be used in connection with any payable through account or service that the FI offers to its clients | | |

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| 7. | Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers? | YES ✓ | NO |
| 8. | Does your institution open anonymous accounts for customers? | YES | NO ✓ |

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 reported to the authorities?	YES ✓	NO
2.	Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	YES ✓	NO
3.	Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	YES ✓	NO
4.	Has your institution applied effective measures to prohibit any trade with entities or individuals defined by blacklist (UN, EU, OFAC, etc.)?	YES ✓	NO
5.	Does the FI have policies to reasonably ensure that it only operates with correspondent banks that possess licenses to operate in their countries of origin?	YES ✓	NO
6.	Does FI adhere to the Wolfsberg Transparency Principles and the appropriate usage of the SWIFT MT 202/202COV and MT 205/205COV message formats?	YES ✓	NO

VIII. Transaction Monitoring

1.	Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	YES ✓	NO
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IX. AML Training

1.	Does the FI provide AML training to relevant employees that includes:	YES ✓	NO
	<ul style="list-style-type: none"> • Identification and reporting of transactions that must be reported to government authorities. • Examples of different forms of money laundering involving the FI's products and services. • Internal policies to prevent money laundering. 		
2.	Does the FI retain records of its training sessions including attendance records and relevant training materials used?	YES ✓	NO
3.	Does the FI communicate new AML related laws or changes to existing AML related policies or practices to relevant employees?	YES ✓	NO
4.	Does the FI employ third parties to carry out some of the functions of the FI?	YES	NO ✓

5. If the answer to question IX / 4 is "YES", does the FI provide AML training to relevant third parties that includes:

YES NO

- Identification and reporting of transactions that must be reported to government authorities.
- Examples of different forms of money laundering involving the FI's products and services.
- Internal policies to prevent money laundering.

Space for additional information:
(Please indicate which question the information is referring to)

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I, on behalf of "ICBC Turkey Bank 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, 10.02.2022**

Full Name(s) : **Ms. EVRİM ÇEBİ**

Title(s) : **Compliance Officer**

Signature(s) : 

THANK YOU FOR YOUR COOPERATION

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- Questions referring to Financial Institution shall be considered by including all domestic and overseas branches, subsidiaries and affiliates in addition to the Head Office.
 - 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.