



PRESIDENCY OF  
THE REPUBLIC OF TÜRKİYE  
**TÜRKİYE  
WEALTH FUND**

## **STATEMENT ON ANTI- MONEY LAUNDERING**

*Approved at the meeting of Board of Directors  
of Türkiye Wealth Fund Management Joint  
Stock Company held on 30 June 2025*

## CONTENT

### **Türkiye Wealth Fund Management Joint Stock Company Statement on Anti-Money Laundering 1**

<b>1. Introduction.....</b>	<b>1</b>
<b>2. Definitions.....</b>	<b>1</b>
<b>3. Scope and Objective.....</b>	<b>2</b>
<b>4. Rules and Principles .....</b>	<b>2</b>
4.1 Company policy .....	2
4.2 Laundering proceed of crime .....	3
4.3 Financing of terrorism.....	3
<b>5. Breach of Statement.....</b>	<b>4</b>
<b>6. Inquiries about the Statement.....</b>	<b>4</b>
<b>7. Approval and Revisions.....</b>	<b>4</b>

## **Türkiye Wealth Fund Management Joint Stock Company Statement on Anti-Money Laundering**

### **1. Introduction**

Türkiye Wealth Fund Management Joint Stock Company (the “**Company**”) is subject to the legal obligations imposed by the Republic of Türkiye, where it operates. These obligations include, among others, those related to the anti-money laundering. Although the Company is not classified as an obliged party under Law No. 5549 on the Prevention of Laundering Proceeds of Crime and the Regulation on Measures Regarding the Prevention of Laundering Proceeds of Crime and the Financing of Terrorism, it nevertheless undertakes to make its best efforts to prevent money laundering and the financing of terrorism.

Within this framework, the Company has prepared this Anti-Money Laundering Statement (the “**Statement**”).

### **2. Definitions**

**Board of Directors:** Refers to the members of the Company's Board of Directors appointed in accordance with the Article 13 of the Council of Ministers' Decision Regarding the Process and Principles Regarding the Structure and Operation of Türkiye Wealth Fund Management Company, dated October 17, 2016, and in accordance with the procedure specified in Presidential Decree numbered 3.

**Deputy General Management of Human Resources:** Refers to the deputy general management responsible for carrying out human resources functions and activities within the Company and the TWF Companies.

**Directorate of Legal, Compliance, and Regulatory:** Refers to the department that reports directly to the general manager and is responsible for ensuring that the Company’s operations are conducted in a regular, efficient, and effective manner, in line with the strategies and policies set by the Board of Directors and in compliance with applicable laws and regulations, and also refers to the corresponding unit in the event of any organizational changes.

**Disciplinary Directive:** Refers to the directive that entered into force pursuant to the Board of Directors’ resolution dated 17/10/2022, which aims to (i) establish a consistent and efficient working order within the Company and the TWF Companies, (ii) set out the rules and obligations that Employees are required to comply with, and (iii) regulate the procedures to be followed and the disciplinary actions to be taken in the event of conduct, behavior, or incidents that violate such rules and obligations.

**Employee(s):** Individual(s) who is/(are) employed by the Company or TWF Companies either directly or through subcontractors.

**Ethics Committee:** Refers to the committee established within the Company, composed of the general manager, executive directors, and the most senior executive responsible for compliance within the Directorate of Legal, Compliance, and Regulatory with the second most senior employee

works on compliance matters within the same Directorate serves as the committee secretary, chaired ex-officio by the general manager of the Company and the committee being responsible for fulfilling the duties assigned to it under the Compliance Policy.

**Senior Management:** Refers to the general manager and executive directors of the Company.

**TWF Companies:** Refers to the companies and sub-funds incorporated by the Company or TWF as controlling shareholders, which do not have separate legal and compliance departments within their own structures and whose human resources processes are managed by Deputy General Management of Human Resources.

**TWF:** Refers to Türkiye Wealth Fund.

### **3. Scope and Objective**

The principles and rules set forth in this Statement shall apply to all Employees. All Employees are required to sign the undertaking provided in ANNEX-1, by which they commit to comply with this Statement. The Statement is communicated to Employees through the means deemed appropriate. The Company expects all Employees to act in accordance with the requirements of this Statement.

The purpose of this Statement is to mitigate the risks of money laundering and terrorist financing by ensuring that the operations and services of the Company, TWF, and TWF Companies are assessed through a risk-based approach, and to raise awareness among Employees regarding such risks.

### **4. Rules and Principles**

#### **4.1 Company policy**

The Company is not designated as an obliged party under Law No. 5549 on the Prevention of Laundering Proceeds of Crime and the Regulation on Measures Regarding the Prevention of Laundering Proceeds of Crime and Financing of Terrorism in Türkiye. Nevertheless, the Company is committed to making every reasonable effort to combat money laundering and the financing of terrorism.

In this context, the Company undertakes to comply, where applicable, with the legislation on the prevention of money laundering, including but not limited to the Turkish Criminal Code No. 5237, the Law No. 5549 on the Prevention of Laundering Proceeds of Crime, and the Law No. 6415 on the Prevention of the Financing of Terrorism.

It is strictly prohibited for TWF, the Company, or Employees to engage in or otherwise be involved in any activity, in any capacity, for the purpose of concealing the origin of assets derived from criminal offenses or creating the impression that such assets were lawfully acquired, as defined under Article 282 of the Turkish Criminal Code No. 5237. Furthermore, it is also prohibited for the Company and Employees to knowingly purchase, accept, possess, or use assets that constitute the subject of a criminal offense.

In addition, it is strictly prohibited for TWF, the Company, or Employees to provide funds to any terrorist or terrorist organization, as set forth under Articles 3 and 4 of the Law No. 6415 on the

Prevention of the Financing of Terrorism. It is also prohibited for TWF, the Company, or Employees to engage in or facilitate any commercial activity with terrorist groups.

Therefore, TWF, the Company, and Employees are required to conduct appropriate due diligence prior to engaging in any business relationship with third parties and to perform reasonable screening in order to determine whether the proposed third parties are involved in any money laundering activities or engaged in any terrorist activities.

#### **4.2 Laundering proceed of crime**

Money laundering refers to the process of integrating proceeds derived from unlawful activities into the financial system in a manner that disguises their illegal origin and makes them appear to have been lawfully obtained. The underlying predicate offenses that give rise to money laundering may take various forms, including but not limited to tax evasion, bribery, or smuggling.

The following types of conduct may be considered “money laundering” and are strictly prohibited under this Statement:

- a) concealing, retaining, converting, or transferring “property derived from criminal activity”,
- b) engaging in transactions that assist another person in acquiring, using, possessing, or controlling property that constitutes criminal proceeds,
- c) acquiring, using, or possessing criminal property,
- d) promoting or facilitating the continuation of unlawful activities,
- e) participating in, attempting to engage in, aiding, abetting, advising, or otherwise facilitating any of the activities listed above,
- f) notifying any individual who is the subject of a money laundering investigation that such investigation has been initiated, is ongoing, or that a report or disclosure related to money laundering has been made.

#### **4.3 Financing of terrorism**

Terrorist financing refers to the provision or collection of funds, by any means, either directly or indirectly, with the intention that they be used, or with the knowledge that they will be used, in order to carry out terrorist offenses. In this context, terrorist financing may take the following forms.

- Funding: The act of providing or acquiring funds or other property for terrorist purposes, including inviting others to make such contributions.
- Use and possession: The use or possession of funds or other property intended to be used for terrorism-related purposes.
- Funding arrangement: Entering into or being a party to an arrangement to make funds or other property available to another person for use in connection with terrorism.

The financing of terrorism does not necessarily involve funding the means used to carry out terrorist acts. As such, it may be difficult to determine whether an individual is engaged in terrorist financing, and all Employees are therefore expected to exercise due care and vigilance.

## **5. Breach of Statement**

Employees are expected to remain vigilant at all times with respect to indicators of money laundering and terrorism financing risks. In the event of an actual or suspected breach of this Statement or any applicable legal regulations, Employees must promptly report the matter to the Directorate of Legal, Compliance, and Regulatory. Failure to report such matters shall itself constitute a breach of this Statement. In this regard, the Company maintains a strict zero-tolerance policy against any form of retaliation towards Employees who, in good faith, report concerns related to any improper conduct.

Any concern regarding a potential breach of this Statement shall be reviewed in accordance with the procedures set forth in the Compliance Policy.

If an Employee is found to have breached this Statement through their conduct, the disciplinary process set out in the Disciplinary Regulation shall be followed, and necessary actions shall be taken in accordance with Disciplinary Regulation.

## **6. Inquiries About the Statement**

Employees who have any questions or concerns regarding this Statement may directly contact the Directorate of Legal, Compliance, and Regulatory.

## **7. Approval and Revisions**

The Ethics Committee is authorized and responsible for the periodic review, enhancement, and revision of this Statement. Preliminary work related to any revisions, improvements, or updates to this Statement is carried out by the Directorate of Legal, Compliance, and Regulatory.

The preliminary work carried out by the Directorate of Legal, Compliance, and Regulatory is submitted to the Ethics Committee for approval. Any proposed amendments shall enter into force upon the approval of the Ethics Committee. The updated Statement is communicated to Employees through appropriate channels.