



PRESIDENCY OF  
THE REPUBLIC OF TÜRKİYE

**TÜRKİYE  
WEALTH FUND**

## **TRADE SANCTION POLICY**

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

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## **Türkiye Wealth Fund Management Joint Stock Company Trade Sanction Policy**

### **1. Introduction**

This Trade Sanctions Policy (“**Policy**”) has been adopted to set forth the core principles of Türkiye Wealth Fund (“**TWF**”) and Türkiye Wealth Fund Management Joint Stock Company (“**Company**”) regarding trade sanctions, and to promote general awareness across the Company concerning sanctions-related matters.

### **2. Definitions**

**Board of Directors:** Refers to the members of the Company's Board of Directors appointed in accordance with Article the 13 of the Council of Ministers' Decision Regarding the Process and Principles Regarding the Structure and Operation of Türkiye Wealth Fund Management Joint Stock 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.

**Foreign Sanctions Lists:** Refers to the lists identifying economic or financial sanctions, restrictive measures, or trade embargoes that are imposed, administered, or enacted, as applicable at the

relevant time, by various sanctioning authorities, including but not limited to Her Majesty's Treasury of the United Kingdom (*HM Treasury*), the European Union, the Office of Foreign Assets Control (*OFAC*) under the U.S. Department of the Treasury, the U.S. Department of State, and the United Nations Security Council.

**Foreign Sanctions Regulations:** Refers to all sanctions and anti-boycott laws, regulations, orders, directives, lists, licenses, and decisions, as applicable at the relevant time, that are adopted, administered, or enforced by the United States Department of State, the Office of Foreign Assets Control (*OFAC*) under the United States Department of the Treasury, the United Nations Security Council, the European Union, Her Majesty's Treasury of the United Kingdom (*HM Treasury*), or any other authority or jurisdiction having regulatory authority over the activities undertaken by the Company

**Sanctions Lists:** Shall refer to the lists identifying economic or financial sanctions, restrictive measures, or trade embargoes that are imposed, administered, or enacted by the Republic of Türkiye, including but not limited to those issued by the Presidency of the Republic of Türkiye or the Financial Crimes Investigation Board (*MASAK*), as may be in force as applicable at the relevant time.

**Sanctions Regulations:** Refers to all sanctions, regulations, communiqués, asset freezing decisions, licenses, and resolutions issued, administered, or enforced by the Republic of Türkiye, primarily by the Presidency of the Republic of Türkiye, the Ministry of Interior, and the Financial Crimes Investigation Board (*MASAK*).

**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.

### **3. Scope of the Policy**

This Policy provides guidance on the Sanctions Regulations and trade sanctions in general, and sets forth the fundamental principles followed by TWF, the Company, and TWF Companies in relation to compliance with both the Sanctions Regulations and Foreign Sanctions Regulations.

### **4. Objectives of the Policy**

This Policy is intended to provide Employees with general information regarding trade sanctions and to outline the position of TWF and the Company on Sanctions Regulations and Foreign Sanctions Regulations.

The Company expects Employees to comply with the requirements set forth under this Policy.

## **5. General Information on Trade Sanctions**

The terms “sanctions,” “trade sanctions,” “economic sanctions,” “financial sanctions,” and “embargoes” refer to legal restrictions imposed on international trade to achieve foreign policy, national security, and/or human rights objectives. Through such measures, sanctioning authorities or jurisdictions aim to deter, penalize, or otherwise influence sanctioned parties by depriving them of economic, commercial, or other benefits, due to conduct that is considered to violate international law principles, or the values, core interests, or security of the sanctioning authority or country.

Trade sanctions may take various forms, depending on the purpose of the sanction and the decisions of the sanctioning country. The type of restriction to be imposed on a sanctioned party may vary based on the severity of the conduct, the intended response, and/or the foreign policy objectives pursued. The following are examples of types of sanctions that may be imposed by different countries at various times and for differing political purposes:

- Comprehensive prohibitions on direct or indirect dealings with sanctioned parties, including the provision of goods or services, and the freezing of their assets,
- Import and export bans, as well as restrictions on the purchase and sale of dual-use goods intended for both military and civilian purposes,
- Restrictions targeting specific sectors, including limitations on conducting activities within those sectors, engaging with parties operating therein, or executing designated types of transactions,
- Restrictions of weapons or similar ammunition.

## **6. Trade Sanctions Under Turkish Law**

Under this section, the legal forms and implications of trade sanctions under Turkish law are set forth with the aim of enhancing general awareness among Employees.

As a rule, Türkiye is not subject to sanctions imposed by third countries (such as the United States) or by organizations of which it is not a member (such as the European Union). However, as a member of the United Nations, Türkiye is under an obligation to comply with the resolutions of the United Nations Security Council. In this context, Türkiye implements resolutions of the United Nations Security Council by ratifying them into its domestic legal framework.

Sanctions implemented by Türkiye are generally enforced in the form of asset freezes imposed on natural and legal persons within its jurisdiction, primarily aimed at preventing money laundering, the financing of terrorism, and the proliferation of weapons of mass destruction.

In this context, such asset freeze measures applied by Türkiye may be grounded in either domestic or international law.

### **6.1 Asset freeze measures grounded in international law**

- (a) United Nations Security Council resolutions ratified into Turkish domestic law

Among the international sanctions enforced by Türkiye, foremost are the asset freezing measures imposed on individuals, entities, or organizations designated under the United Nations Security Council Resolutions No. 1267 (1999), 1988 (2011), 1989 (2011), and 2253 (2015). These asset freezing measures are implemented upon the publication of the Presidential Decree concerning the freezing of assets in the Official Gazette.

(b) Asset freezing measures implemented upon requests of foreign states

Türkiye may evaluate asset freezing requests submitted by foreign states, and based on such evaluation, may decide by Presidential Decree to freeze the assets of the person, entity, or organization subject to the request in accordance with Law No. 6415 on the Prevention of the Financing of Terrorism.

## **6.2 Asset freezing measures and other trade sanctions directly imposed by the Republic of Türkiye**

In Türkiye, the assets located within the country of individuals who provide or collect funds for acts that constitute the financing of terrorism or the provision or collection of funds for prohibited purposes are subject to freezing by decisions of the Ministry of Treasury and Finance and the Ministry of Interior. The consolidated list of persons whose assets have been frozen in Türkiye is accessible through the consolidated lists (<https://en.hmb.gov.tr/fcib-tf-current-list>) published by the Financial Crimes Investigation Board (*MASAK*).

In contrast, Türkiye does not have a dedicated governmental authority focused solely on sanctions, such as the Office of Foreign Assets Control (*OFAC*) in the United States. Similarly, there is no primary legal source in Türkiye that consolidates all sanction-related regulations under a single framework.

Sanctions to be imposed against other countries must be enacted through Presidential Decrees, Presidential Decisions, or laws.

## **7. Compliance with Sanctions by the Company and TWF**

The Company is subject to the provisions of private law pursuant to Article 2 of Law No. 6741 on the Establishment of Türkiye Wealth Fund Management Joint Stock Company and Amendments to Certain Laws. As a legal entity established under Turkish law and governed by private law, and considering that TWF is a fund established in Türkiye, the Company and TWF are, in principle, subject only to the Sanctions Regulations in the context of trade sanctions.

Foreign Sanctions Regulations (such as those imposed by the United States, the United Kingdom, or the European Union) are, in principle, not binding on the Company and TWF unless and until they are ratified into Turkish law. Nevertheless, the Company and TWF comply with trade sanctions that have been ratified into Turkish legislation and thus form part of the applicable legal framework in Türkiye.

In addition to sanctions ratified into Turkish law and thereby forming part of the Turkish legal framework, the Company and TWF, as a matter of principle, also commit to complying with the laws and other applicable regulations of relevant jurisdictions where legal authority may be established due to factors such as currency used, nationality, or territoriality, to the extent such laws are applicable to their activities.

Employees must remain aware that the applicability of sanction rules may vary based on the specific circumstances of each transaction, and that such rules are subject to rapid change due to political and economic developments. In addition to the establishment of jurisdiction, factors such as contractual obligations, reputational concerns, and access to certain investments may also necessitate the Company or TWF to assess compliance with Foreign Sanctions Regulations in the context of their transactions. Accordingly, each transaction may, as a rule, require a case-by-case sanctions analysis, taking into consideration all relevant elements of the transaction along with current developments and legal amendments.

The Directorate of Legal, Compliance, and Regulatory screens potential business partners from whom TWF intends to obtain financing or in whom it intends to invest, as well as, where deemed necessary, the Company's potential business partners, against Sanctions Lists to ensure TWF's and the Company's compliance with Sanctions Regulations. Where circumstances are so required, the Directorate of Legal, Compliance, and Regulatory may also screen such potential business partners against Foreign Sanctions Lists. In addition, TWF and the Company take other risk-mitigating measures as they deem necessary in connection with potential trade sanctions

## **8. Breach of the Policy**

Any conduct by an Employee, in the course of performing their duties under this Policy, that is contrary to the applicable Sanctions Regulations or Foreign Sanctions Regulations imposed on the Company, TWF, or the Employee, shall constitute a breach of this Policy.

Likewise, where it is learned by any means by an Employee, or where a reasonable suspicion arises, that another Employee has failed to comply with the Sanctions Regulations or Foreign Sanctions Regulations applicable as described in this Policy, any failure to notify the Directorate of Legal, Compliance, and Regulatory without delay, or any attempt to conceal such situation or to prevent its disclosure, shall also constitute a breach of this Policy.

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

In the event that an Employee is found to have breached this Policy through their conduct, the process stipulated in the Disciplinary Regulation shall be initiated, and appropriate actions shall be taken in accordance with the provisions thereof.

## **9. Trainings**

Where deemed necessary and at appropriate intervals, the Directorate of Legal, Compliance, and Regulatory and Deputy General Management of Human Resources provide training to Employees

regarding the scope and purpose of this Policy, with a view to raising awareness and enhancing understanding of the Sanctions Regulations, and where appropriate, the Foreign Sanctions Regulations.

When deemed necessary, the Directorate of Legal, Compliance, and Regulatory in coordination with the Deputy General Management of Human Resources, organizes additional trainings on updates to sanctions regimes and other related matters in alignment with global developments, and updates the relevant training materials accordingly.

The organization of the trainings to be delivered under this Policy are overseen by Deputy General Management of Human Resources.

#### **10. Inquiries about the Policy**

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

#### **11. Approval and Revisions**

The Ethics Committee is authorized and responsible for the periodic review, enhancement, and revision of this Policy. Preliminary work related to any revisions, improvements, or updates to this Policy 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 Policy is communicated to Employees through appropriate channels.