



London Branch

A Statement Regarding the Branch's Anti-Money Laundering Policy and Controls

Question1.

Is your institution subject to laws and regulations designed to prevent money laundering in your country?

Answer 1.

The Turkish AML legislation and regulations applicable to Turkiye Is Bankasi A.S. fully comply with those required of a full member of the F.A.T.F. Also Turkey is a founder member of the F.A.T.F. and that Turkiye Is Bankasi A.S. in Turkey has policies and procedures in place to comply with these laws and regulations.

However, this statement covers only the London Branch of Turkiye Is Bankasi A.S., which is subject to the laws and regulations of the United Kingdom.

Question 2.

Do you have a “physical presence” or are you a regulated affiliate of an entity with a “physical presence”?

For the purposes of this questionnaire “physical presence” means a place of business:

- *Located at a fixed address (other than solely an electronic address, a post office address or an accommodation address); **and***
- *In a country in which the bank is authorised to conduct banking activities; **and***
- *Where the bank employs 1 or more individuals full-time and maintains operating records related to banking activities; **and***
- *Where the bank is subject to inspection by the banking authority, which licensed the bank to conduct banking activities.*

Answer 2.

Yes we do have a physical presence our principle place of business in the UK is located at;

8 Princes Street, London, EC2R 8HL

and our registered Head Office is located at;

IS Kuleleri, 34330, Levent, Istanbul, TURKEY

In the UK our Companies House registration reference is

FC12054

Question 3.

With regard to your ownership structure are you publicly owned and listed on any stock exchange? If so, which?

Answer 3.

Turkiye Is Bankasi A.S. is publicly owned and listed on both the Istanbul and London stock exchanges. Further details can be obtained from our website at www.isbank.com.tr

Question 4.

Is your institution subject to the supervision of any regulatory authority?

Answer 4.

In London we are subject to the supervision of The Financial Services Authority and our Firm Reference number is 204708

Question 5.

Do you maintain a policy and procedures for the prevention of money laundering and terrorist financing?

Answer 5.

Yes we do.

Question 6.

Do your policies and procedures meet the requirements of local law and regulations on anti-money laundering and terrorist financing?

Answer 6.

Yes they do.

Question 7.

Do these policies and procedures apply to all of the operations covered by this questionnaire?

Answer 7.

Yes they do.

Question 8.

If you have foreign branches and subsidiaries, are they subject to anti-money laundering and terrorist financing laws applicable to you and your policy and control on the prevention of money laundering and terrorist financing?

Answer 8.

We are a full branch of an international bank and do not have separate subsidiaries or branches. Please refer to the answer to question 1.

Question 9.

Do you have arrangements for the independent monitoring and auditing of compliance with the policies and procedures? If the answer is yes how frequently are they audited or tested.

Answer 9.

We do have in place accepted procedures for auditing compliance with our AML policies and procedures. Our compliance is monitored continually using a risk-based approach by the branch's MLRO, by our internal audit department from Head Office and by our external auditors on an annual basis.

Question 10.

Does the policy clearly define roles, responsibilities, and accountability of each member of staff in relation to anti-money laundering and terrorist financing?

Answer 10.

Yes it does and these are clearly laid out in our AML Handbook, which each member of staff is required to re-read each 6 months.

Question 11.

Do you have a Money Laundering Reporting Officer responsible for co-ordinating the Anti-money laundering program of your institution? If yes please provide the name and contact details of the officer.

Answer 11.

Yes we do the MLRO is

Mr Robert Wood

Tel 0207 397 1444

Email address: robertpwood@isbank.co.uk

Question 12.

Does the policy stipulate the internal controls and procedures on monitoring and reporting suspicious customers and transactions to a nominated officer?

Answer 12.

Yes it does.

Question 13.

Do your procedures require the disclosure of suspicious transactions to a national criminal intelligence service or other external authority?

Answer 13.

Yes they do following independent due consideration the MLRO, our nominated officer will make such a report to the Serious Organised Crime Agency.

Question 14.

Do you have an employee-training program for prevention of money laundering and terrorist financing requiring all staff to undertake training? If so, how frequently is training undertaken?

Answer 14.

Yes we do and all newly appointed members of staff are required to undertake a training course upon joining the branch. Focused and relevant training is then undertaken by each member of staff on an annual basis in line with the FSA rules and JMLSG guidance that states that training should be provided each 24 months.

Question 15.

Does your institution have a risk-focused assessment of its customer base and customer transactions?

Answer 15.

Yes we do in conjunction with a full AML risk assessment of the various products we offer.

Question 16.

Does your institution determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that your institution has reason to believe pose a heightened risk?

Answer 16.

Yes in conjunction with the requested product.

Question 17.

Do your customer identification procedures meet the current recommendations of the FATF?

Answer 17.

Yes they do.

Question 18.

Do your procedures require the verification of identification information for all counterparties prior to entering into transactions?

Answer 18.

Yes they do.

Question 19.

Does your institution take steps to understand the normal and expected transactions of its customer based on its risk assessment of its customers?

Answer 19.

Yes we do.

Question 20.

Do you verify the identity of all customers including “occasional customers”, prior to providing value transfer services (such as telegraphic transfers, bank cheques or trade transactions) involving more than USD10,000 in cash?

Answer 20.

Yes we do. In fact Identification is sought for any amount and each customer is filtered through the lists given in answer 21.

Question 21.

Do you search your customer account database for terrorist names? If yes, please indicate what list of names is used.

Answer 21.

We regularly check all existing customers and check new customers and all remittances upon application for business against the lists below.

Bank of England, European Union, Home Office, OFAC , Isle of Man FSC , OSFI, United Nations,

SCC , FBI, Interpol, CFTC, FCEN, OFAC Civil penalties, OCC, OSFI Warnings, SEC, FSA, IMRO

Lloyds insurance Bureau of industry & Security, I of M FSC enforcements, World Bank PEP

Question 22.

Do your procedures require you to identify the source of your customer’s initial funds?

Answer 22.

Yes they do.

Question 23.

Do your procedures require you to retain all relevant documents and information in respect to customer identity according to the regulatory authorities for at least five years?

Answer 23.

Yes they do since we are required to retain such documents for a minimum of 5 years following the last transaction on an account or from the date of closure whichever is the later date.

Question 24.

Do your policies prohibit dealings with shell banks?

Answer 24.

Yes they do.

Question 25.

Does your institution have policies to reasonable insure that it only operates with correspondent banks that possess licences to operate in their countries of origin?

Answer 25.

Yes we do.

Question 26.

Do you satisfy yourselves that your client institutions verify the identity of, and perform ongoing due diligence on, their customers having direct accounts with you and are able to provide customer identification data upon your request?

Answer 26.

Yes we do.

Question 27.

Has your institution been involved in any regulator's or criminal enforcement action resulting from violations of anti-money laundering laws or regulations in the past five years?

Answer 27.

Our institution has never been involved in such enforcement action. We are aware of our ethical responsibilities and make every effort to meet them in spirit as well as simply following the rules.

Question 28.

Do you have customers that are;

- A) High net worth (exceeding USD 10,000,000) individuals served by a dedicated private banking unit?**
- B) Based in countries classified by the FATF as high risk?**
- C) Senior political figures?**
- D) Money transmission services that are not licensed or authorised by a regulatory or governmental body?**

Answer 28.

- A) We do not.
- B) We do not.
- C) We do not.
- D) We do not.

Question 29.

Please provide the names of all shareholders who are entitled to exercise, or control the exercise of, 20 percent or more of the voting rights of the institution.

Answer 29.

Please refer to our website at www.isbank.com.tr .

We trust that the above information is helpful to your institution and thank you for your cooperation and understanding regarding this matter and hope that together we can effectively combat money laundering and terrorist financing. In order to assist us in maintaining our records we would appreciate you sending us your responses to the same questions. Should you have any questions related to this subject please do not hesitate to contact our MLRO via the means given above.