



COMPANY POLICY ON ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM

1. Purpose

The purpose of this policy is to ensure compliance with international legal regulations and best practices regarding anti-money laundering and combating the financing of terrorism (AML/CFT) in Goldtakas's precious metals transactions. This policy is a guide to minimize risks throughout the company's global activities and to create an ethical working environment among business partners, employees and clients.

2. Scope

This policy covers Goldtakas's entire precious metal supply chain, commercial transactions and financial operations. Goldtakas complies with national and international legal regulations and standards regarding money laundering and financing of terrorism in all countries where it operates.

3. Legal Basis and International Standards

Our company operates in accordance with the following global regulations and standards:

- Financial Action Task Force (FATF) Recommendations: 40 recommendations set global standards for preventing money laundering and financing of terrorism.
- United Nations Security Council Resolutions: Contains global measures against the financing of terrorism.
- U.S. Office of Foreign Assets Control (OFAC) Regulations
- European Union AML Directives
- OECD Gold Supply Chain Guide: Provides an international framework for the responsible procurement and traceability of precious metals.

4. Risk-Based Approach

Goldtakas adopts a risk-based approach to prevent money laundering (AML) and combat financing of terrorism (CFT) in the precious metals sector. This approach allows the company to systematically identify and manage risks by considering factors such as transaction volume, client profile, geographic area and supply chain. The main purpose of the risk-based approach is to identify and assess potential AML/CFT risks and take appropriate measures to prevent or minimize these risks.



4.1 Principles of the Risk-Based Approach

The risk-based approach involves determining different risk levels for each client, transaction or relationship and taking appropriate measures for each risk level. The company focuses on high-risk activities by applying different levels of client due diligence (CDD) and transaction monitoring according to the risk levels of transactions and clients.

This approach includes the following steps:

1. Risk Identification: Goldtakas identifies potential risks by considering factors such as client profile, transaction type, geographic location and supply chain.
2. Risk Assessment: Identified risks are assessed in terms of probability and potential impact. At this stage, the risks posed by clients, transactions or suppliers are classified into different degrees (low, medium, high).
3. Risk Management: Appropriate risk reduction and management strategies are developed according to the risk levels determined as a result of risk assessment. These strategies ensure that stricter measures are taken for high-risk transactions and clients.
4. Continuous Monitoring and Review: The risk-based approach is a dynamic process. Transactions and clients are monitored regularly, and as risk levels change, the company's approach is reviewed and updated when necessary.

4.2 Risk Factors

Goldtakas considers various factors to manage risks. These factors are examined under four main headings:

1. Client Risk Factors:

- Client Nature: Is the client an individual, or a legal entity? Who is the ultimate beneficial owner (UBO)? The ultimate ownership structure and field of activity of legal entities are carefully examined.
- Client History: Has the client been previously linked to money laundering or financing of terrorism? Is he/she on sanction lists?
- Client Behavior: Are the transactions made by the client consistent with the size of the company and its field of activity? Are there any unusual transaction behaviors?

2. Geographic Risk Factors:

- Geographic Location of the Client or the Transaction: Goldtakas evaluates whether the clients or transactions are from high-risk regions (e.g., risky regions in terms of money laundering or financing of terrorism, as determined by the FATF).
- Countries of Operation: The level of compliance with AML/CFT laws and practices of the countries in which the transaction is made or which are in the supply chain is examined.



3. Product and Service Risk Factors:

- Type of the Precious Metal: Certain types of metals may pose higher risks for money laundering and the financing of terrorism (e.g., liquid precious metals such as gold).
- Transaction Type and Volume: Cash-based transactions, cross-border transfers and unusually large-volume transactions may pose higher risks.

4. Supply Chain and Third-Party Risks:

- Examination of Suppliers and Business Partners: Goldtakas evaluates the AML/CFT compliance of all suppliers and business partners and ensures that precious metals from reliable sources are used.
- Traceability: Traceability of the supply chain is ensured and documented. Additional reviews are conducted in case of uncertainty or risk in any link of the supply chain.

4.3 Risk Management Tools

Various strategies and tools are used to manage risks. These tools are adapted and implemented according to the field of activity of Goldtakas:

1. Customer Due Diligence and Advanced Due Diligence:

- Standard Due Diligence: Basic identity verification and document checks are performed for low and medium risk clients.
- Enhanced Due Diligence: More extensive verification procedures are implemented for high-risk clients. This may include additional document requests, source inquiries, and detailed retrospective investigations.

2. Transaction Monitoring and Suspicious Transaction Reporting:

- Real-Time Transaction Monitoring: Goldtakas monitors precious metals trading and financial transactions in real time. When unusually large transactions or unexpected activities are detected, these transactions are immediately investigated.
- Suspicious Transaction Reporting: Suspicious transactions are reported to the relevant national and international authorities in a timely manner.

3. Continuing Training and Awareness:

- Employee Training: Employees are continuously trained on strategies to combat money laundering and the financing of terrorism. Training aims to strengthen skills in identifying and reporting risks.
- Third Party Awareness: Goldtakas also introduces the risk-based approach to its suppliers and business partners and creates awareness on this issue.

4. Regular Risk Assessment:

- Periodic Reviews: Goldtakas regularly reviews the risk management processes. These reviews aim to identify new risk factors and evaluate the effectiveness of the measures implemented against existing risks.



4.4 Additional Measures for High-Risk Clients and Transactions

When high-risk clients or transactions are detected, additional measures are taken:

- Enhanced Review: Additional document requests are made for high-risk clients and transactions, and transactions are monitored more closely.
- Management Approval: High-risk transactions may require approval from the company's top management.
- Cessation of Cooperation: Cooperation with high-risk clients or suppliers may be terminated or transactions may be suspended.

5. Know Your Customer Process (KYC)

Goldtakas strictly adheres to international KYC (Know Your Customer) processes. Within this framework:

- Identities of all clients are verified, and documents are regularly updated.
- For high-risk clients, the ownership structure and ultimate beneficial owners (UBO) are determined.
- The client's financial structure, business relationships and history of precious metals trading are evaluated.
- As part of the KYC process, risk rating is performed by taking into account geographic risk (clients in high-risk regions), business line risks and transaction volumes.

Within the framework of the "Know Your Customer" Policy, we request the following documents, but we may also request additional documents required by special circumstances for a sound intelligence:

- 1 - Copy of ID
- 2 - Copy of Passport
- 3 - Authorized Signatory List/Signature Declarations
- 4 - Company Articles of Association
- 5 - Tax Certificate
- 6 - Activity Certificate and Establishment Certificate
- 7 - Residence Certificate
- 8 - Bank Account Information

6. Suspicious Activity Report (SAR)

Suspicious transactions are detected/reported by both Goldtakas's internal monitoring systems and employees and immediately notified to national and international authorities.

- Suspicious transactions are quickly reported to relevant authorities, and transactions are suspended when necessary.
- All suspicious transaction reports are kept confidential and shared only with authorized persons.



7. Working with Third Parties and Supplier Audit

Goldtakas conducts a detailed examination process before doing business with all third parties and suppliers with whom it trades precious metals:

- Before collaborating with third parties, comprehensive checks are conducted for risk of money laundering and financing of terrorism.
- Regular monitoring and audits are carried out on the supply chain.
- Continuous information flow is provided to ensure the traceability of the precious metals purchased from high-risk suppliers.

8. Training and Awareness

Goldtakas employees receive regular training on combating money laundering and the financing of terrorism. The training covers:

- KYC and CDD processes.
- Identifying and reporting suspicious transactions.
- Risk-based approaches and client relationship management.
- International regulations and local legal requirements.

9. Internal Audit and Compliance Program

Goldtakas is regularly inspected by independent internal audit units to ensure the effective implementation of the AML/CFT compliance program. Internal audit includes the following steps:

- Periodic review of transaction records.
- Effectiveness of suspicious transaction reporting and monitoring systems.
- Evaluation of the extent to which the compliance program complies with current international standards.

10. Sanctions and Discipline

Violation of our policy may result in disciplinary action within Goldtakas. These actions are taken if any illegal activity involving employees or business partners is detected. In addition, serious violations are reported to national and international authorities and legal action is initiated.

11. Updating the Policy

This policy is regularly reviewed and updated in accordance with new global regulations, risks or operational requirements. The policy is reviewed based on internal audit reports and changes in international regulations.