

## Anti-Money Laundering /Anti- Terrorist Financing Questionnaire

### I. Customer Information:


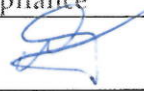
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| Legal name of Institution: GARANTI BANK S.A.   |
| Principal place of business (address), web address: 5 <sup>th</sup> Fabrica de Glucoza Street, Business Center, Novo Park 3, F Building, 5 <sup>th</sup> -6 <sup>th</sup> Floors, Sector 2, Bucharest, Romania<br><a href="http://www.garantibank.ro">www.garantibank.ro</a> |
| Corporate legal form: Joint stock company  |
| Registration Number (Fiscal/Unique Code): RO25394008   |
| Banking license: Series I No. 003 dated 17 August 2009   |
| Proof of Incorporation: Trade Registry no. J40/4429/02.04.2009   |
| Name of ultimate parent institution (if applicable): Türkiye Garanti Bankası A.Ş.  |
| Parent Institution's Physical Address: Nispetiye Mah., Aytar Cad No 2 – Besiktas, Levent, 34340 Istanbul, Turkey   |
| Relationship with parent (agency / branch / subsidiary): Subsidiary  |
| Jurisdiction of licensing authority and regulator of parent: Turkey  |
| Name of Banking Supervision: Banking Regulation and Supervision Agency   |
| Registration/License: 11.04.1946-3/4010 25.04.1946/6291  |
| Authority which issues banking license: Istanbul Chamber of Commerce   |
| Number of branches: domestic, foreign: 71 domestic agencies in Romania, no foreign branch  |
| Name of external auditors: Ernst & Young Romania   |
| Official Authority of reporting in case of suspicion of ML or FT: National Office for Prevention and Control of Money Laundering   |
| Main Shareholders and their ownership interest (%)<br>1. G Netherlands B.V., Netherlands - 99,9967% (100% owned by Garanti Holding B.V., Netherlands - entirely owned by Türkiye Garanti Bankası A.Ş., Turkey);<br>2. Garanti Holding B.V., Netherlands - 0,0033%.           |
| Executive President & CEO: Tiftikcioglu MUSTAFA, General Manager   |
| Has your institution appointed a compliance officer for AML/CFT/KYC?<br>Name: Iuliu MURESAN, Deputy General Manager<br>Phone number: + 40-21-208 92 60, int 1328<br>e-mail address: <a href="mailto:iuliu.muresan@garantibbva.ro">iuliu.muresan@garantibbva.ro</a>           |
| Authorized Officer responsible for the establishment of Correspondent Banking/Account relationship<br>Arif Adnan Ayman, Head of Financial Institutions   |

### II. General AML Policies, Practices and Procedures

|   | YES        | NO |
|---|------------|----|
| 1. Has the country in which you are located established laws designed to prevent money laundering and terrorism financing?  | YES        |    |
| 2. Does the law require banks to have written procedures for the prevention of money laundering and terrorism financing?  | YES        |    |
| 3. Does the FI have a legal and regulatory compliance program that:<br>a. requires approval of the FI's Board or a senior committee thereof?<br>b. includes a designated Compliance officer that is responsible for coordinating and overseeing the AML program on a day-to-day basis which has been approved by senior management of the FI? | YES<br>YES |    |

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| 4. In case your institution does not have such regulations, are they planned to be introduced? Please indicate the estimated date of its implementation.  | N/A   |    |
| 5. Has your institution been subject of any investigation, indictment, conviction or civil enforcement action related to money laundering and terrorism financing in the past five years?   |   | NO |
| 6. In addition to inspections by the government supervisors/ regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?                       | YES   |    |
| 7. Dose the FI have a policy prohibiting accounts/ relationships with shell banks?  | YES   |    |
| 8. Dose the FI have a policy prohibiting open or maintain of anonymous accounts?  | YES   |    |
| 9. Does the FI have policies covering relationships with politically exposed persons, their family and close associates consistent with industry best practices?  | YES   |    |
| 10. Does the FI have record retention procedures that comply with applicable law?   | YES   |    |
| 11. Does the FI require that its AML policies and practices be applied to all branches and subsidiaries of the FI both in the home country and in locations outside of the home country?  | YES   |    |
| 12. Does your institution provides Payable Through Accounts (Payable Through Accounts are accounts opened by banks and financial institutions at other banks and put at their customers' disposal to be used directly or through sub-accounts)? |   | No |
| <b>III. Risk Assessment</b>   |   |    |
| 13. Does the FI have a risk based assessment of its customer base and transactions of its customers?  | YES   |    |
| 14. 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   |    |
| 15. Does the FI have proper system put in place to track transactions on the basis of risk classification of countries and do not entertain transactions with high risk categorized countries?  | YES   |    |
| <b>IV. Know Your Customer, Due Diligence and Enhanced Due Diligence</b>   |   |    |
| 16. Has the FI implemented systems for the identification of its customers, including customer information in the case of recorded transactions, account opening, etc.?   | YES   |    |
| 17. Does your AML/CFT/KYC Policies and Procedures require:  |   |    |
| a. recognizing the true identity of customers and checking their legitimacy before transacting any business with them?  | YES   |    |
| b. identifying any third party that makes use of correspondent banking services?  | YES   |    |
| c. monitoring client activity to detect suspicious activity and due diligence?  | YES   |    |
| d. reporting suspicious activities and transactions to the appropriate AML/CFT/KYC authorities?   | YES   |    |
| e. keeping all the records related to customer identification and their transactions? For how long?   | YES<br>at least 5<br>years from<br>the date of<br>the<br>transaction /<br>termination<br>of the<br>business<br>relationship |    |

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| 18. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?  | YES |  |
| 19. Does the FI have process to review and, where appropriate, update customer information relating to high risk client information?  | YES |  |
| <b>V. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds</b>  |     |  |
| 20. Does your institution screens the names of the clients and the international transactions against OFAC, UN and EU lists?  | YES |  |
| 21. Does your institution have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?  | YES |  |
| 22. Where cash transaction reporting is mandatory, does your institution have policies and procedures to identify transactions structured to avoid such obligations?  | YES |  |
| 23. Does the FI screen transactions for customers or transactions the FI deems to be of significantly high risk (which may include persons, entities or countries that are contained on lists issued by government/international bodies) that special attention to such customers or transactions is necessary prior to completing any such transactions? | YES |  |
| 24. Does the FI have policies to reasonably ensure that transactions are not conducted with countries that appear as sanctioned entities on lists provided by government/international bodies?  | YES |  |
| 25. Does the FI have policies to ensure that it will not conduct transactions with or provide downstream products and services to other FIs that do not comply with industry best practices?  | YES |  |
| <b>VI. Transaction Monitoring</b>   |     |  |
| 26. Does your institution have a monitoring program for suspicious or unusual activities that covers funds transfers (incoming and outgoing), and monetary instruments (such as travellers checks, money orders, etc.)?   | YES |  |
| <b>VII. AML Training</b>  |     |  |
| 27. Does your institution provide AML awareness training to relevant employees?   | YES |  |
| 28. Does your institution retain records of its training sessions including attendance records and relevant training materials used?  | YES |  |

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| <b>Name:</b>      | Adnan Arif AYMAN  | Mihai PRAJEA   |
| <b>Title:</b>     | Head of Financial Institutions  | Head of Compliance   |
| <b>Signature:</b> |  |  |
| <b>Date:</b>      | April 26, 2022  | April 26, 2022   |