



**ONSA RAFİNERİ A.Ş.**

**PREVENTION OF MONEY LAUNDERING AND  
TERRORIST FINANCING (AML&CFT)**

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Our company is a member of the Republic of Turkey Financial Action Task Force (FATF) and has implemented legal regulations in line with FATF standards in the fight against money laundering. After Onsa Rafineri A.Ş. became an accredited refinery to Borsa İstanbul A.Ş. in 2014, it started to work on compliance with the legislation in order to meet the conditions stipulated by the accreditation and the relevant legislation and to harmonize the company activities with national and international practices.

Following the publication of the Regulation on Measures for the Prevention of Laundering Proceeds of Crime and Financing of Terrorism by the Government of the Republic of Turkey in the Official Gazette dated 09.01.2008 and numbered 26751, compliance with the legislation has become a legal obligation. Onsa Rafineri A.Ş. conducts its business activities with the utmost attention to the provisions introduced by this Regulation, as well as the relevant provisions of Law No. 6415 on the Prevention of the Financing of Terrorism, dated 07.02.2013, and Law No. 7262 on the Prevention of the Financing of the Proliferation of Weapons of Mass Destruction, dated 27.12.2020, that pertain to its field of operations. Compliance with the regulations and practices of the Financial Crimes Investigation Board (MASAK) affiliated to the Ministry of Finance, the financial intelligence unit of the Republic of Turkey. United Nations Security Council's Resolution 1373 (2001), adopted on 28.09.2011, the following is envisaged regarding the regulation of financing of terrorism as a crime requiring heavy punishment the freezing of all assets and economic resources belonging to terrorists and members of terrorist organizations without delay, the member states to carry out intensive cooperation among themselves in the fight against terrorism, Freezing the assets of individuals and organizations that they determine to be related to terrorism and terrorist financing, and preventing the creation of direct or indirect financial resources for terrorists and terrorist organizations. Within the scope of this decision of the United Nations Security Council, which is binding for the member states, it has been tried to comply with the regulations on not taking any action with the listed persons or organizations. By refraining from any action that contributes to the financing of the conflict, Onsa Rafineri A.Ş. undertakes not to engage in any direct or indirect trade with the countries, regions, individuals, organizations and countries that are subject to the following sanctions, and the countries called for action published by FATF, including the countries/regions on the List of Prohibited Countries, Sanctions imposed by the United Nations Security Council resolutions, sanctions issued by the European Union, sanctions issued by the United Kingdom Treasury, OFAC sanctions issued by the American Treasury and other sanctions to which Borsa İstanbul A.Ş. Precious Metals Market is subject. In this context, Onsa Rafineri A.Ş. has established this company policy in order to follow national and international legislation and practices and to Prevent Laundering of Proceeds of Crime and Financing of Terrorism.



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Onsa Rafineri A.Ş aims to support all national and international efforts in the fight against money laundering, financing of terrorism and other related crimes, and to comply with all laws and other regulations. With the directives, methods, monitoring and controls, it is aimed to protect the company and our customers from risks and to constantly monitor and control whether the activities of the institution are carried out in accordance with the laws, regulations and communiqués issued in accordance with the laws, institution policies and methods, and the rules and directives of international institutions.

Onsa Rafineri A.Ş aims to support all national and international efforts in the fight against money laundering, financing of terrorism and other related crimes, and to comply with all laws and other legal regulations.

The harmonious operating principles of Onsa Rafineri A.Ş. are listed below;

- 1-) Compliance with all legal regulations,
- 2-) To cooperate with regulatory authorities in the national and international context,
- 3-) Compliance with business ethic principles.

Onsa Rafineri A.Ş develops and implements an anti-money laundering program in compliance with the legal regulations on the prevention of money laundering, financing of terrorism and other related criminal activities both in Turkey and in other countries where it operates.

Said program covers;

Identifying and assessing risks in the supply chain,

Written policy and methods,

To appoint a Compliance Officer,

anti-money Laundering (AML) policies and methods,

Audit that will test the effectiveness and developments of the program in practice,

The internal audit and control system that will ensure that activities are carried out in accordance with the legal regulations of both Turkey and other countries in which it operates,

Following the developments and innovations in the legislation and updating them in accordance with the policies and methods when necessary,

To provide training to staff on the subject.



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Implementation of the AML program is the responsibility of all personnel.

Policies and Methods are briefly as follows;

- 1.) Know Your Customer Principle: To have accurate and sufficient information about customers, to monitor transactions, to monitor whether the activities of customers and/or suppliers are compatible with income, assets, occupation information, etc. are the foundation of the principle of "Know Your Customer" which is the basis of Onsa Rafineri A.Ş.'s customer acceptance policy regarding the prevention of money laundering and terrorist financing. Great importance is attached to the "Know Your Customer" principle in order to be protected from people and actions related to money laundering and terrorist financing, and in this context, it is implemented by adopting a policy in line with relevant international standards and applicable legislation.
- 2.) Establishing a Business Relationship: No business relationship is entered into with customers and/or suppliers without providing the necessary information and documents. Blacklist checks are made at customer acceptance.
- 3.) Bookkeeping: Customer information and documents, records of transactions are kept for at least 8 years.
- 4.) Suspicious Transaction Reporting: All suspicious transactions are reported to the relevant authorities and, when requested, to domestic and foreign authorities to establish cooperation. Employees of the company are ensured to pay attention to Suspicious Transaction Reporting.
- 5.) National and International Cooperation: When necessary, works are carried out in cooperation with regulatory authorities. Collaboration includes operations such as providing information, blocking accounts.
- 6.) Education: Apart from the training provided by the compliance officer, meetings are held regarding the lack of knowledge and experience noticed during the activities, and the deficiencies are eliminated in these meetings.
- 7.) Compliance Officer: Compliance Officer works to ensure that the activities are carried out in compliance with the legislation and the rules and principles of the sector.





The Compliance Officer works to carry out the necessary studies in order to ensure compliance with the regulations, to ensure communication and coordination, to ensure the execution of the compliance program, to manage evaluation, monitoring and control activities and to follow the results of training activities, to submit the studies on the training program for the prevention of money laundering and the financing of terrorism to the approval of the Board of Directors and to ensure the effective implementation of the approved training program, to conduct research and evaluation about transactions that may be suspicious or that he/she has learned ex officio, and to

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notify the Board of Directors of the transactions that it considers suspicious. While fulfilling these duties, the Compliance Officer works in cooperation with the Risk Committee, Finance, Operations and Legal Advisors, and in this direction, he meets with the relevant people periodically and evaluates the works. Suspicious transaction notifications are the notifications that the state keeps in maximum confidentiality, and maximum security measures are determined for the people who make the notification with the Laws of the Republic of Turkey. In addition, company personnel are under guarantee by Onsa Refinery due to their actions and transactions within the scope of compliance with national and international legislation. Company employees carry out the transactions with the assurance that they are not faced with any negative approach or sanction due to their compliant behavior and work in consultation with the Compliance Officer.

8.) Risk management: Risk management activities related to the implementation of the Onsa Refinery Compliance Program are designed by the Compliance Officer within the framework of the relevant legislation and policy provisions and are carried out within the Risk Committee. Activities related to risk management are carried out at least;

- Developing risk identification, risk rating, classification and evaluation methods based on customer risk and country risk (Onsa Refinery Risk Matrix),
- Risk reduction, monitoring, control and reporting in a way to warn the relevant units, execution of the transaction with the approval of a higher authority,
- Carrying out necessary development studies by following the recommendations, principles, standards and guides brought by national legislation and international organizations regarding the subjects within the scope of risk,
- For the groups determined as high risk as a result of the risk rating, in order to reduce the risk to be assumed, at least the following additional measures are taken:

-  Developing methods for continuous monitoring of transactions and customers,
-  Entering into a business relationship, maintaining the existing business relationship or depending on the approval of the top management for the execution of the transaction,
-  Obtaining as much information as possible about the purpose of the transaction and the source of the asset subject to the transaction,
-  Providing additional information and documents within the scope of the recognition of the customer, taking additional measures for the confirmation and verification of the information presented.





- The following countries and regions, as well as customers and suppliers located in or associated with these countries and regions, are closely followed in the high risk category:

-  Countries included in the "Non-Cooperating Countries" list announced by FATF,
-  Countries included in the "Risky Countries" list announced by the relevant Ministry,



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-  Countries announced by the European Union or OFAC and stated to have a high risk of money laundering,
  -  Cross-border centers, free zones and financial centers,
  -  Tax havens,
  -  Countries that do not have adequate regulations on the prevention of money laundering and terrorist financing.

Making the necessary preparations for the full implementation of this Policy at Onsa Rafineri A.Ş., All company employees and managers are informed about the establishment of systems, management units and individuals sharing their opinions, suggestions and thoughts on the subject and the sector in which we operate, with the senior management, and making maximum efforts in the fight against money laundering, financing of terrorism and other related crimes.