## the Wolfsberg Group

Financial Institution Name: Location (Country) : T.C. ZIRAAT BANKASI A.S. ATHENS CENTRAL BRANCH GREECE

*	Question	Answet
1, ENTIT	Y & OWNERSHIP	
	Full Legal name	T.C, ZIRAAT BANKASI A.S, ATHENS CENTRAL BRANCH
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	N/A
3	Full Legal (Registered) Address	2, ERMOU STR. ATHENS, POSTAL CODE 10563
1	Full Primary Business Address (if different from above)	-41-
5	Date of Entity Incorporation/establishment	29/01/2008
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No L
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No Las
6 c	Government or State Owned by 25% or more	Yes
6 d	Privately Owned	No
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	Turkey Wealth Fund Management , 100%
7	% of the Entity's total shares composed of bearer shares	0%
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	No No
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide services only through online channels?	No P
10	Provide Legal Entilly Identifier (LEI) if available	
э дин	CTF & SANCTIONS PROGRAMME	
2. AIVIL, 11	Does the Entity have a programme that sets	A STATE OF THE STA
	minimum AML, CTF and Sanctions standards regarding the following components:	
11 a	Appointed Officer with sufficient experience/expertise	Yes
	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 b 11 c 11 d	Beneficial Ownership Cash Reporting	Yes L
11 c	Beneficial Ownership	

11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11]		
	PEP Screening	Yes A
11 k	Risk Assessment	Yes
11 I	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes DZ
11 n	Training and Education	Yes
11 o	Transaction Monitoring	Yes
12	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	Yes
13	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	No
13 a	If Y, provide further details	
4.4	Daniel and the form and the first of the fir	
14	Does the entity have a whistleblower policy?	Yes
	RIBERY & CORRUPTION	10 海水区,至20 数据,各国的2015年10月10日被2016年2月26
15	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
16	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	No
17 b	1st Line of Defence	No S. A.
17 c	2nd Line of Defence	No
17 d		
	3rd Line of Defence	No
17 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	No S
17 f	Non-employed workers as appropriate (contractors/consultants)	No
4. AML. C	TF & SANCTIONS POLICIES & PROCEDURES	
18	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	新規模 (2) 第
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and fictifious named accounts	Yes
19 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes
19 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes
19 d	Prohibit accounts/relationships with shell banks	Yes
19 e	Prohibit dealing with another Entity that provides services to shell banks	Yes
19 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes
19 g	Prohibit opening and keeping of accounts for any of unlicensed/unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	Please select Ves S
19 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	Yes
19 <b>i</b>	Define the process for escalating financial crime risk issues/potentially suspicious activity identified by employees	Yes
19 j	Outline the processes regarding screening for sanctions, PEPs and Adverse Media/Negative News	Yes

#es the Entry defined a risk tolorance statement or similar document with defines a risk brokense by around their business?  21 a	eread
thet comply with applicable laws?  If Y, what is the retention period?  Syears or more  Syears or more  Syears or more  CDD table property by billions and procedures as at cut when CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD must be completed, e.g. at the time of CDD and the complete of CDD and t	X
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Trigger-based or perpetual monitoring reviews  Other (please specify)  Trigger-based or perpetual monitoring reviews  Other (please specify)  Trigger-based or perpetual monitoring reviews  Other (please specify)  From the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  Arms, Defence, Milltary  Respondent Banks  History  FedD on risk-based approach  Always subject to EDD  assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Other (please specify)  From the list below, which categories of customers entities are subject to EDD on risk-based approach  EDD on risk-based approach  EDD on risk-based approach  Gambling customers  Frohibited  EDD on risk-based approach	
Other (please specify)  Trom the list below, which categories of customers or industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  Arms, Defence, Military  Respondent Banks  Respondent Banks  If EDD or FDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  Cembassies/Consulates  EDD on risk-based approach  EDD on risk-based approach  EDD on risk-based approach  Cambling customers  EDD on risk-based approach  Gambling customers  Frohibited  General Trading Companies  EDD on risk-based approach	
industries are subject to EDD and/or are restricted, or prohibited by the Entity's FCC programme?  30 a Arms, Defence, Milltary EDD on risk-based approach 30 b Respondent Banks Atways subject to EDD 30 b1 If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  30 c Embassies/Consulates EDD on risk-based approach 30 d Extractive Industries EDD on risk-based approach 30 e Gambling customers Prohibited 30 f General Trading Companies EDD on risk-based approach	
30 b Respondent Banks Always subject to EDD  30 b1 If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  30 c Embassies/Consulates EDD on risk-based approach  30 d Extractive Industries EDD on risk-based approach  30 e Gambling customers Prohibited  30 f General Trading Companies EDD on risk-based approach	
30 b1 If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  30 c Embassies/Consulates EDD on risk-based approach 30 d Extractive Industries EDD on risk-based approach 30 e Gambling customers Prohibited 30 f General Trading Companies EDD on risk-based approach	
assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?  30 c Embassies/Consulates EDD on risk-based approach  30 d Extractive Industries EDD on risk-based approach  30 e Gambling customers Prohibited  30 f General Trading Companies EDD on risk-based approach	
30 d Extractive Industries EDD on risk-based approach 30 e Gambling customers Prohibited 30 f General Trading Companies EDD on risk-based approach	
30 e Gambling customers Prohibited 30 f General Trading Companies EDD on risk-based approach	Page 1
30 f General Trading Companies EDD on risk-based approach	Bi.
Company Company	
1	
30 h MSB/MVTS customers Prohibited	1:17
30 i Non-account customers Prohibited	
30 J Non-Government Organisations EDD on risk-based approach	T-Page
30 k Non-resident customers EDD on risk-based approach	ls.

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30 I	Nuclear power	Prohibited	T
30 m	Payment Service Providers	Prohibited	Y
30 n	PEPs PEPs		F. A
30 o	PEP Close Associates		
30 p	PEP Related		
30 q			
30 r	Precious metals and stones	EDD on risk-based approach	Z
	Red light businesses/Adult entertainment	Prohibited	
30 s	Regulated charities	EDD on risk-based approach	
30 t	Sheli banks	Prohibited	B. All
30 u	Travel and Tour Companies	EDD on risk-based approach	
30 v	Unregulated charities	Prohlbited	Y
30 w	Used Car Dealers	EDD on risk-based approach	
30 x	Virtual Asset Service Providers	Prohibited	<b>b</b>
30 y	Other (specify)		
31	If restricted, provide details of the restriction		
6. MONIT	DRING & REPORTING		
32	Does the Entity have risk based policies, procedures		
	and monitoring processes for the identification and reporting of suspicious activity?	Yes	•
33	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	▼
33 a	If manual or combination selected, specify what type of transactions are monitored manually	Transactions that are above the threshold and didn't produce an alert	,
34	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	Y
34 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	Yes	- <b>(</b> -
35	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	
7. PAYME	NT TRANSPARENCY		(ASSECT
36	Does the Entity adhere to the Wolfsberg Group		24,4 4
	Payment Transparency Standards?	Yes	935
37	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:		
37 a	FATF Recommendation 16	Yes	تسييا
37 b	Local Regulations	Yes	
37 b1	If Y, Specify the regulation	EU REGULATION 847/2015	
37 c	∃f N, explain		
8, SANCT	IONS		Tille i
38	Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?	Yes	
39	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?	Yes	

FCCQ V1,2

40	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes	$\searrow$	
41	Select the Sanctions Lists used by the Entity in its sanctions screening processes:			
41 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners (i.e. reference data	•	
41 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners (i.e. reference data	¥	
41 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for filtering transactional data	V	
41 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners (i.e. reference data	•	
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data	V	
41 f	Other (specify)	UK		
42	Does the Entity have a physical presence, e.g. branches, subsidiaries, or representative offices located in countries/regions against which UN, OFAC, OFSI, EU or G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	No		
9. TRAIN	NING & EDUCATION			
43	Does the Entity provide mandatory training, which includes:			
43 a	Identification and reporting of transactions to government authorities	Yes	•	
43 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes	•	
43 с	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes	•	
43 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes	-	
44	Is the above mandatory training provided to:	Exercise that a company to a second		
44 a	Board and Senior Committee Management	Yes	Antonio	
44 b	1st Line of Defence	Yes	V	
44 c 44 d	2nd Line of Defence	Yes	Y	
	3rd Line of Defence	Yes	*	
44 e	Third parties to which specific FCC activities have been outsourced	No	•	
44 f	Non-employed workers (contractors/consultants)	No	~	
10. AUD	A CONTROL OF THE STREET AND ADDRESS OF THE STREET ADDRESS OF THE STREET AND ADDRESS OF THE STREET ADDRESS OF THE STREET AND ADDRESS OF THE STREET AND ADDRESS OF THE STREET ADDRESS OF THE STREET AND ADDRESS OF THE STREET ADDRESS OF THE STREET ADDRESS OF			
45	In addition to inspections by the government supervisors/regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF, ABC, Fraud and Sanctions policies and practices on a regular basis?	Yes	>	
	Page  Group Financial Crime Compliance Questionnaire 2023 (FCCQ  AT BANKASI A.S. ATHENS CENTRAL BRANCH	V1.2) (Financial Institution name)		
I,understood	Ithis	pplance Manager- Second Line representative), certify that I have read a	ind	
declaration	, that the answers provided in this Wolfsberg FCCQ are comple	23		