KOLUMAN
ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM POLICY

KOLUMAN

Compliance Program

1. Purpose and Scope

This policy has been established to demonstrate Koluman Holding's obligations and commitment to preventing the laundering of criminal proceeds, the financing of terrorism, and the financing of the proliferation of weapons of mass destruction.

Koluman Holding adheres to a zero-tolerance policy towards money laundering and terrorist financing activities, ensuring full compliance with national and international regulations. This policy applies to all Koluman Holding employees, managers, affiliates, business partners, customers, suppliers and contractors, and is implemented in all geographical areas where the company operates.

2. Fundamental Principles

Koluman Holding adopts the following principles in the fight against money laundering and terrorist financing:

Compliance and Adherence to Laws: To comply with all applicable national and international legal regulations and international standards in the fight against money laundering and terrorist financing.

Prevention, Detection and Intervention: Establishing effective controls to prevent risks, detecting suspicious transactions and reporting them to the appropriate authorities in a timely manner.

Know Your Business (KYB): Analysing customers, suppliers and business partners in detail, refraining from entering into business relationships with risky individuals and organisations.

Transparency and Accountability: Ensuring full transparency in business processes, recording financial transactions and being open to audits.

Training and Awareness: Ensuring that employees are trained on money laundering and terrorist financing.

3. Implementation of the Policy

3.1. Identification of Business Partners and Customers (KYC and KYB Procedures)

Koluman Holding conducts detailed due diligence on customers, suppliers and business partners in accordance with the Embargo, Prohibition and Risk Assessment Regulation before entering into a business relationship.
In this context:

- The identity details of business partners and customers are verified.

- National and international sanctions lists (OFAC, UN, EU, Treasury and Ministry of Finance, etc.) are checked.
- The business partner is investigated to determine whether they have a history of suspicious financial transactions.
- No business relationships are established with suspicious individuals or high-risk countries.

3.2. Detection and Reporting of Suspicious Transactions

Situations deemed to be suspicious transactions are immediately reported to the company's compliance unit for referral to the competent authorities (MASAK, Financial Supervisory Authorities, International Audit Organisations).

3.3. Training and Awareness Raising for Employees

Regular training programmes are organised to ensure that employees understand the risks of money laundering and terrorist financing and act appropriately.

These training sessions cover:

- Explanations of the concepts of money laundering and terrorist financing.
- How to identify and report suspicious transactions.
- Awareness is raised about legal obligations and international sanctions.
- Real-life examples are provided to raise employee awareness.

3.4. Internal Controls and Audits

Koluman Holding operates an effective risk management and internal audit mechanism against money laundering and terrorist financing, ensuring the security of the financial system. Within this scope, regular internal audits are conducted and comprehensive risk assessments are carried out. All of the company's business processes are meticulously examined by the Internal Audit, Corporate Risk and Compliance Directorate, and necessary measures are taken to identify potential risks in advance.

In line with risk analyses, high-risk customers, countries and transactions are identified and subjected to detailed scrutiny. Identified non-compliance and suspicious transactions are assessed in accordance with the principle of transparency and reported to the relevant management bodies, and necessary actions are taken. This process ensures that the company operates within an ethical and legal framework, while strengthening reliability and sustainability in business processes.

4. Authority and Responsibilities

At Koluman Holding, all employees and managers act within the framework of their defined responsibilities to prevent the laundering of criminal proceeds and the financing of terrorism. Employees are obliged to report any suspicious transactions to the compliance unit without delay. Managers are responsible for developing, implementing and ensuring the effectiveness of risk prevention policies.

These processes are carried out by the Internal Audit, Corporate Risk and Compliance Directorate. Suspicious transaction reports are carefully investigated, necessary actions are taken, and reports are submitted to the relevant authorities. Training and awareness programmes are organised to increase employees' knowledge on the subject, and risky transactions are analysed and presented to the board of directors. When compliance violations are detected, internal investigation processes are carried out, necessary measures are taken, and the company's full compliance with ethical and legal regulations is ensured.

5. Validity and Updates

Date of First Publication	Revision Date/No.	Explanation
08.04.2025	-	-

Compliance
Programme

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