the Wolfsberg Group

Financial Institution Name: Location (Country) : TERA YATIRIM BANKASI A.S. TURKEY

The questionnaire is required to be answered on a Legal Entity (LE) Level. The Financial Institution should answer the questionnaire at the legal entity level including any branches for which the client base, products and control model are materially similar to the LE Head Office. This questionnaire should not cover more than one LE. Each question in the CBDDQ will need to be addressed from the perspective of the LE and on behalf of all of its branches. If a response for the LE differs for one of its branches, this needs to be highlighted and details regarding this difference captured at the end of each sub-section. If a branch's business activity (products offered, client base etc.) is materially different than its Entity Head Office, a separate questionnaire can be completed for that branch.

No#	Question	Answer
1. ENTITY	& OWNERSHIP	
1	Full Legal Name	TERA YATIRIM BANKASI A.S.
2	Append a list of foreign branches which are covered by this questionnaire	
3	Full Legal (Registered) Address	MASLAK MAH. ESKI BUYUKDERE CAD. IZ PLAZA NO:9 K:4 D:10 SARIYER / ISTANBUL
4	Full Primary Business Address (if different from above)	
5	Date of Entity Incorporation/establishment	07.07.2022
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	No
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned/Mutual	No
6 c	Government or State Owned by 25% or more	No
6 d	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or uttimate beneficial owners with a holding of 10% or more	Shareholder: Emre Tezmen 95%
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
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
10	Name of primary financial regulator/supervisory authority	1-BANKING REGULATION AND SUPERVISION AGENCY (BRSA) 2-FINANCIAL CRIMES INVESTIGATION BOARD (FCIB) 3-CENTRAL BANK OF REPUBLIC OF TURKEY (CBRT)
11	Provide Legal Entity Identifier (LEI) if available	789000CS9LB25B2WHU53
12	Provide the full legal name of the ultimate parent (if different from the Entity completing the DDQ)	

13	Jurisdiction of licensing authority and regulator of	
	ultimate parent	TURKEY
14	Select the business areas applicable to the Entity	
14 a	Retail Banking	
14 b	Private Banking	Yes
14 D		No Yes
	Commercial Banking	Yes
14 d	Transactional Banking	Yes
14 e	Investment Banking	Yes
14 f	Financial Markets Trading	Yes
14 g	Securities Services/Custody	Yes
14 h	Broker/Dealer	No
14 i	Multilateral Development Bank	
14 j	Wealth Management	No No
14 k	Other (please explain)	
15	Does the Entity have a significant (10% or more)	
	portfolio of non-resident customers or does it derive	
	more than 10% of its revenue from non-resident	
	customers? (Non-resident means customers primarily	No
	resident in a different jurisdiction to the location	
	where bank services are provided)	
15 a		
15 a	If Y, provide the top five countries where the non- resident customers are located.	
16	Select the closest value:	
16 a		
	Number of employees	51-200
16 b	Total Assets	Between \$100 and \$500 million
17	Confirm that all responses provided in the above	No branches
	Section are representative of all the LE's branches.	No branches
17 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
18	If appropriate, provide any additional information/context to the answers in this section.	
2. PROD	UCTS & SERVICES	
19	Does the Entity offer the following products and	the second s
	services;	
19 a		
19 a 1	Correspondent Banking If Y	No
19 a 1 19 a 1a		
19 a1a 19 a1b	Does the Entity offer Correspondent Banking services to domestic banks?	Please select
19 a1c	Does the Entity allow domestic bank clients to provide downstream relationships?	Please select
	Does the Entity have processes and procedures in place to identify downstream relationships with domestic banks?	Please select
19 a1d	Does the Entity offer Correspondent Banking services to foreign banks?	Please select
19 a1e	Does the Entity allow downstream relationships with foreign banks?	Please select
19 a1f	Does the Entity have processes and procedures in place to identify downstream relationships with foreign banks?	Please select
l9 a1g	Does the Entity offer Correspondent Banking services to regulated Money Services Businesses (MSBs)/Money Value Transfer Services (MVTSs)?	Please select
l9 a1h	Does the Entity allow downstream relationships with MSBs, MVTSs, or Payment Service Provider (PSPs)?	
9 a1h1	MSBs	Please select
0 41 5	MVTSs	
9 a1h2	1010135	
19 a1h2 19 a1h3	PSPs	Please select Please select

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Yes Image: Screening Yes			Yes
Kisk Assessment Yes 221 Sanctions Yes			Yes
ZZI Sanctions Yes		T	Yes
	21	Sanctions	Yes

22 m	Suspicious Activity Reporting	Yes
22 n	Training and Education	Yes
22 0	Transaction Monitoring	Yes
23	How many full time employees are in the Entity's AML, CTF & Sanctions Compliance Department?	1-10
24	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? If N, describe your practice in Question 29.	Yes
25	Does the Board receive, assess, and challenge regular reporting on the status of the AML, CTF, & Sanctions programme?	Yes
26	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	Yes
26 a	If Y, provide further details	FINEKSUS PAYGATE INSPECTOR
27	Does the entity have a whistleblower policy?	Yes
28	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
28 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
29	If appropriate, provide any additional information/context to the answers in this section.	
4. ANT	I BRIBERY & CORRUPTION	
30	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to reasonably prevent, detect and report bribery and corruption?	Yes
31	Does the Entity have an enterprise wide programme. that sets minimum ABC standards?	Yes 🗸
32	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	Yes
33	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	Yes
34 35	Is the Entity's ABC programme applicable to:	Both joint ventures and third parties acting on behalf of the Entity
35 a	Does the Entity have a global ABC policy that: Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage.	Yes
35 b	Includes enhanced requirements regarding interaction with public officials?	Yes
35 c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	
36	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	Yes
37	Does the Board receive, assess, and challenge regular reporting on the status of the ABC programme?	Yes
38	Has the Entity's ABC Enterprise Wide Risk Assessment (EWRA) been completed in the last 12 months?	Yes 🗸
38 a	If N, provide the date when the last ABC EWRA was completed.	
39	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	Yes
40	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	Yes
40 a	Potential liability created by intermediaries and other third-party providers as appropriate	Yes

40 b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	Yes	-
40 c	Transactions, products or services, including those that involve state-owned or state-controlled entities or public officials	Yes	-
40 d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	Yes	•
40 e	Changes in business activities that may materially increase the Entity's corruption risk	Yes	
41	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	Yes	•
42	Does the Entity provide mandatory ABC training to:		
42 a	Board and senior Committee Management	Yes	
42 b	1st Line of Defence	Yes	أسمع
42 c	2nd Line of Defence	Yes	
42 d	3rd Line of Defence	Yes	
42 e	Third parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable	-
42 f	Non-employed workers as appropriate (contractors/consultants)	Not Applicable	-
43	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	Yes	
44	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	-
44 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.		
45	If appropriate, provide any additional information/context to the answers in this section.		
5 AMI C	TF & SANCTIONS POLICIES & PROCEDURES		-
46	Has the Entity documented policies and procedures		-
	consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
46 a	Money laundering	Yes	
46 b	Terrorist financing	Yes	
46 c	Sanctions violations	Yes	أمسينا
47	Are the Entity's policies and procedures updated at least annually?	Yes	
48	Has the Entity chosen to compare its policies and procedures against:		
48 a	U.S. Standards	No	
48 a1	If Y, does the Entity retain a record of the results?	Please select	التعقيا
48 b	EU Standards	No	
48 b1	If Y, does the Entity retain a record of the results?	Please select	
49	Does the Entity have policies and procedures that:		
49 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	Yes	
49 b	Prohibit the opening and keeping of accounts for unlicensed banks and/or NBFIs	Yes	-
49 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	Yes	
49 d	Prohibit accounts/relationships with shell banks	Yes	and the second
49 e	Prohibit dealing with another entity that provides services to shell banks	Yes	-
49 f	Prohibit opening and keeping of accounts for Section 311 designated entities	Yes	-
49 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	Yes	•
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49 i Define the process for accalating financial criter shats weight of the second second weight of the second s	
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58 a Customer Due Diligence Yes	
58 b Governance Yes 58 c List Management Yes	<u></u>
58 c List Management Yes 58 d Management Information Yes	

58 e	Nome Sereening	
58 e 58 f	Name Screening	Yes
	Transaction Screening	Yes
58 g 59	Training and Education	Yes
	Has the Entity's Sanctions EWRA been completed in the last 12 months?	Yes
59 a	If N, provide the date when the last Sanctions EWRA was completed.	
60	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
60 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
61	If appropriate, provide any additional information/context to the answers in this section.	
7. KYC,	CDD and EDD	
62	Does the Entity verify the identity of the customer?	Yes
63	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days?	Yes
64	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
64 a	Customer identification	Yes
64 b	Expected activity	Yes
64 c	Nature of business/employment	Yes
64 d	Ownership structure	Yes
64 e	Product usage	Yes
64 f	Purpose and nature of relationship	Yes
64 g	Source of funds	Yes
64 h	Source of wealth	Yes
65	Are each of the following identified:	
65 a	Ultimate beneficial ownership	Yes
65 a1	Are ultimate beneficial owners verified?	Yes
65 b	Authorised signatories (where applicable)	Yes
65 c	Key controllers	Yes
65 d 66	Other relevant parties What is the Entity's minimum (lowest) threshold applied to beneficial ownership identification?	Yes 25%
67	Does the due diligence process result in customers receiving a risk classification?	Yes
67 a	If Y, what factors/criteria are used to determine the customer's risk classification? Select all that apply:	
67 a1	Product Usage	Yes
67 a2	Geography	Yes
67 a3	Business Type/Industry	Yes
67 a4	Legal Entity type	Yes
67 a5	Adverse Information	Yes
67 a6	Other (specify)	
68	For high risk non-individual customers, is a site visit a part of your KYC process?	No
68 a	If Y, is this at:	
68 a1	Onboarding	Please select
68 a2 68 a3	KYC renewal	Please select
68 a 4	Trigger event Other	Please select
68 a4a	If yes, please specify "Other"	r Poase Seidu
69	Does the Entity have a risk based approach to screening customers for Adverse Media/Negative News?	Yes
69 a	If Y, is this at:	
69 a1	Onboarding	Yes
69 a2	KYC renewal	Yes

69 a3	Trigger event	Yes
70	What is the method used by the Entity to screen for	
	Adverse Media/Negative News?	Combination of automated and manual
71	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
71 a	If Y, is this at:	
71 a1	Onboarding	Yes
71 a2	KYC renewal	Yes
71 a3	Trigger event	Yes
72	What is the method used by the Entity to screen PEPs?	Combination of automated and manual
73	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	Yes
74	Is KYC renewed at defined frequencies based on risk rating (Periodic Reviews)?	Yes
74 a	If yes, select all that apply:	
74 a1	Less than one year	Yes
74 a2	1 – 2 years	No
74 a3	3 – 4 years	No
74 a4	5 years or more	No Arrest
74 a5	Trigger-based or perpetual monitoring reviews	Yes
74 a6 75	Other (Please specify) Does the Entity maintain and report metrics on current	
	and past periodic or trigger event due diligence reviews?	Yes
76	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?	
76 a	Arms, defence, military	EDD on risk-based approach
76 b	Respondent Banks	EDD on risk-based approach ~
76 b1	If EDD or restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2022?	Yes
76 c	Embassies/Consulates	EDD on risk-based approach
76 d	Extractive industries	EDD on risk-based approach
76 e	Gambling customers	Prohibited
76 f	General Trading Companies	EDD on risk-based approach
76 g	Marijuana-related Entities	Prohibited
76 h	MSB/MVTS customers	
76 i	Non-account customers	
76 j	Non-Government Organisations	EDD on risk-based approach
76 k	Non-resident customers	Prohibited
76	Nuclear power	Prohibited
76 m	Payment Service Providers	EDD on risk-based approach
76 n	PEPs	EDD on risk-based approach
76 o	PEP Close Associates	EDD on risk-based approach
76 p	PEP Related	EDD on risk-based approach
76 q	Precious metals and stones	EDD on risk-based approach
76 r	Red light businesses/Adult entertainment	Prohibited
76 s	Regulated charities	EDD on risk-based approach
76 t	Shell banks	
76 u	Travel and Tour Companies	
	Unregulated charities	EDD on risk-based approach
76 v		Prohibited
76 w	Used Car Dealers	EDD on risk-based approach
76 x 76 y	Virtual Asset Service Providers Other (specify)	EDD on risk-based approach
77	If restricted, provide details of the restriction	
78	Does EDD require senior business management and/ or compliance approval?	Yes

	1		
78 a	If Y indicate who provides the approval:	Both	
79	Does the Entity have specific procedures for		
	onboarding entities that handle client money such as	Yes	
	lawyers, accountants, consultants, real estate agents?		
80	Does the Entity perform an additional control or	Yes	-
	quality review on clients subject to EDD?		
81	Confirm that all responses provided in the above	No branches	-
	Section are representative of all the LE's branches		
81 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
82	If appropriate, provide any additional information/context to the answers in this section.		
8. MONIT	ORING & REPORTING		
83	Does the Entity have risk based policies, procedures		
00	and monitoring processes for the identification and reporting of suspicious activity?	Yes	-
84	What is the method used by the Entity to monitor transactions for suspicious activities?	Combination of automated and manual	•
84 a	If manual or combination selected, specify what type of transactions are monitored manually	Internal control, operation units or relationship managers may always perform a suspicious transaction control for a transaction even if the monitoring tool did not generate alert for that specific transaction.	
84 b	If automated or combination selected, are internal system or vendor-sourced tools used?	Both	-
84 b1	If Vendor-sourced tool' or 'Both' selected, what is the name of the vendor/tool?	FINEKSUS PAYGATE ANALYZER	
84 b2	When was the tool last updated?	< 1 year	
84 b3	When was the automated Transaction Monitoring application last calibrated?	< 1 year	•
85	Does the Entity have regulatory requirements to report suspicious transactions?	Yes	-
85 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements?	Yes	•
86	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	Yes	•
87	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to monitoring?	Yes	•
88	Does the Entity have processes in place to respond to Request For Information (RFIs) from other entities in a timely manner?	Yes	-
89	Does the Entity have processes in place to send Requests for Information (RFIs) to their customers in a timely manner?	Yes	-
90	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches	-
90 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to		
91	If appropriate, provide any additional information/context to the answers in this section.		
9. PAYME	NT TRANSPARENCY		
92	Does the Entity adhere to the Wolfsberg Group		2 - 3
	Payment Transparency Standards?	Yes	-

93	Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with:	
93 a	FATF Recommendation 16	Yes
93 b	Local Regulations	Yes
93 b1	If Y, specify the regulation	1-Law No. 5549 on Prevention of Laundering Proceeds of Crime 2-Law No. 6415 On Prevention Of The Financing Of Terrorism 3-Law No. 7262 On Prevention Of The Financing Of Proliferation Of Weapons Of Mass Destruction 4-Regulation On Program Of Compliance With Obligations Of Anti-Money Laundering And Combating The Financing Of Terrorism
93 c	lf N, explain	
94	Does the Entity have controls to support the inclusion of required and accurate originator information in cross border payment messages?	Yes
95	Does the Entity have controls to support the inclusion of required beneficiary information cross-border payment messages?	Yes
95 a	If Y, does the Entity have procedures to include beneficiary address including country in cross border payments?	Yes
96	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
96 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
97	If appropriate, provide any additional information/context to the answers in this section.	
10. SANG		
98	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
99	Does the Entity have policies, procedures, or other controls reasonably designed to prevent the use of another entity's accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)?	Yes
100	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
101	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	Yes
102	What is the method used by the Entity for sanctions screening?	Both Automated and Manual
102 a	If 'automated' or 'both automated and manual' selected:	
102 a1	Are internal system of vendor-sourced tools used?	Vendor-sourced tools
102 a1a	If a 'vendor-sourced tool' or 'both' selected, what is the name of the vendor/tool?	FINEKSUS PAYGATE INSPECTOR
102 a2	When did you last test the effectiveness (of finding true matches) and completeness (lack of missing data) of the matching configuration of the automated tool? (If 'Other' please explain in Question 110)	< 1 year
103	Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists?	Yes
104	What is the method used by the Entity?	Combination of automated and manual

105	Does the Entity have a data quality management programme to ensure that complete data for all transactions are subject to sanctions screening?	Yes
106	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
106 a	Consolidated United Nations Security Council Sanctions List (UN)	Used for screening customers and beneficial owners and for filtering transactional data
106 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	Used for screening customers and beneficial owners and for filtering transactional data
106 c	Office of Financial Sanctions Implementation HMT (OFSI)	Used for screening customers and beneficial owners and for filtering transactional data
106 d	European Union Consolidated List (EU)	Used for screening customers and beneficial owners and for filtering transactional data
106 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners and for filtering transactional data
106 f	Other (specify)	Decisions of Presidency of Republic of Turkey
107	When regulatory authorities make updates to their Sanctions list, how many business days before the entity updates their active manual and/or automated screening systems against:	
107 a	Customer Data	Same day to 2 business days
107 b	Transactions	Same day to 2 business days
108	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
109	Confirm that all responses provided in the above Section are representative of all the LE's branches	No branches
109 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
110	If appropriate, provide any additional information/context to the answers in this section.	
	ING & EDUCATION	
111	Does the Entity provide mandatory training, which includes:	
111 a	Identification and reporting of transactions to government authorities	Yes
111 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	Yes
111 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	Yes
111 d	New issues that occur in the market, e.g. significant regulatory actions or new regulations	Yes
111 e	Conduct and Culture	Yes
111 f	Fraud	Yes
112	Is the above mandatory training provided to:	
112 a	Board and Senior Committee Management	Yes
112 b	1st Line of Defence	Yes
112 c	2nd Line of Defence	Yes
112 d 112 e	3rd Line of Defence Third parties to which specific FCC activities have	Yes
	been outsourced	Not Applicable
112 f	Non-employed workers (contractors/consultants)	Not applicable
113	Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high-risk products, services and activities?	Yes
114	Does the Entity provide customised training for AML, CTF and Sanctions staff?	Yes 🔽
114 a	If Y, how frequently is training delivered?	Annually
115	Confirm that all responses provided in the above	
	Section are representative of all the LE's branches	No branches

	for preventing & detecting fraud?	Yes
128	Does the Entity have a dedicated team responsible	
141	Does the Entity have policies in place addressing fraud risk?	Yes
14. FRAU		
-		
126	If appropriate, provide any additional information/context to the answers in this section.	
	and the branch/es that this applies to.	
125 a	section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	
125	Confirm that all responses provided in the above	No branches
124	Are adverse findings from internal & external audit tracked to completion and assessed for adequacy and completeness?	Yes
123 k 123 l	Training & Education Other (specify)	Yes
123 j	Transaction Screening including for sanctions	Yes
123 i	Transaction Monitoring	Yes
123 h	Technology	Yes
123 g	Suspicious Activity Filing	Yes
123 e 123 f	Name Screening & List Management Reporting/Metrics & Management Information	Yes Yes
123 d	KYC/CDD/EDD and underlying methodologies	Yes
123 c	Governance	Yes
123 b	Enterprise Wide Risk Assessment	Yes
123 a	AML, CTF, ABC, Fraud and Sanctions policy and procedures	Yes
123	Does the internal audit function or other independent third party cover the following areas:	
122 b	External Third Party	Yearly
122 a	Fraud and Sanctions programme by the following: Internal Audit Department	Yearly
122	practices on a regular basis? How often is the Entity audited on its AML, CTF, ABC,	
121	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	Yes
13. AUDIT 121	In addition to inspections by the government	
120	If appropriate, provide any additional information/context to the answers in this section.	
120	and the branch/es that this applies to.	
119 a	Section are representative of all the LE's branches If N, clarify which questions the difference/s relate to	No branches
119	Compliance Testing process (separate from the independent Audit function)? Confirm that all responses provided in the above	Yes
118	Quality Assurance programme for financial crime (separate from the independent Audit function)? Does the Entity have a program wide risk based	Yes
117	Does the Entity have a program wide risk based	
12 0141	Y ASSURANCE /COMPLIANCE TESTING	
116	If appropriate, provide any additional information/context to the answers in this section.	
115 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	

129	Does the Entity have real time monitoring to detect fraud?	Yes
130	Do the Entity's processes include gathering additional information to support its fraud controls, for example: IP address, GPS location, and/or device ID?	Yes
131	Confirm that all responses provided in the above section are representative of all the LE's branches	No branches
131 a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
132	If appropriate, provide any additional information/context to the answers in this section.	
Declaration Statement Wolfsberg Group Correspondent Banking Due Diligence Questionnaire 2023 (CBDDQ V1.4) Declaration Statement (To be signed by Global Head of Correspondent Banking or equivalent position holder AND Group Money Laundering Prevention Officer, Global Head of Anti- Money Laundering, Chief Compliance Officer, Global Head of Financial Crimes Compliance OR equivalent)		
TERA YATIRIM BANKASI A.S. (Financial Institution name) is fully committed to the fight against financial crime and makes every effort to remain in full compliance with all applicable financial crime laws, regulations and standards in all of the jurisdictions in which it does business and holds accounts. The Financial Institution understands the critical importance of having effective and sustainable controls to combat financial crime in order to protect its reputation and to meet its legal and regulatory obligations. The Financial Institution recognises the importance of transparency regarding parties to transactions in international payments and has adopted/is committed to adopting these standards.		
The Financial Institution further certifies it complies with / is working to comply with the Wolfsberg Correspondent Banking Principles and the Wolfsberg Trade Finance Principles. The information provided in this Wolfsberg CBDDQ will be kept current and will be updated no less frequently than every eighteen months.		
The Financial Institution commits to file accurate supplemental information on a timely basis.		
I, LIGEN ERTUG UTKU the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
I, GUVEN AYDIN (MLRO or equivalent), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg CBDDQ are complete and correct to my honest belief, and that I am authorised to execute this declaration on behalf of the Financial Institution.		
01.07.2025 (Signature & Date) 01.07.2025 (Signature & Date)		