

**Scope:** Modeling and Design Of Jewelry with Gold, Silver Precious Metals and Precious Stones (Diamonds), Production, Sale and Export

### Overview

Kuasar Kuyumculuk (Kurshuni) is committed to protecting businesses and financial systems from the abuse of financial crimes, including money laundering, terrorist financing, and other illicit activities. Money laundering involves concealing financial assets to avoid detection of their illegal origins.

This AML/CFT Policy, along with the procedures and internal controls outlined below, forms part of Kuasar Kuyumculuk (Kurshuni)'s comprehensive Compliance Program. These measures are designed to ensure strict adherence to all applicable laws, regulations, and guidelines.

### Purpose and Practices

At Kuasar Kuyumculuk (Kurshuni), we adhere to the highest standards of compliance and ethical business practices. We are firmly against knowingly facilitating any illegal activity. By applying AML and CFT measures, we actively prohibit the misuse of our operations or services for money laundering or to evade transaction reporting requirements.

#### 1. Due Diligence

Kuasar Kuyumculuk (Kurshuni) implements a rigorous review and screening process for all suppliers of jewelry, precious metals, This includes:

- Conducting supplier KYC questionnaires to verify ownership and location details.
- Confirming that suppliers have robust compliance policies and procedures.
- Addressing red flags or inconsistencies promptly.

Ongoing diligence ensures that suppliers remain compliant throughout their business relationship with Kuasar Kuyumculuk (Kurshuni).

#### 2. Risk Assessment

Kuasar Kuyumculuk (Kurshuni) recognizes that certain transactions or suppliers may pose heightened compliance risks. To manage these risks effectively:

- Suppliers or transactions are categorized based on risk levels.
- Enhanced due diligence is conducted when high-risk factors are identified.
- Kuasar Kuyumculuk (Kurshuni) reserves the right to reject suppliers or transactions deemed unacceptable.

#### 3. Suspicious Transaction Reporting

Employees must immediately notify their manager if they identify credible evidence of suspicious activities, including but not limited to:

- Customers attempting to trade in stolen merchandise.
- Payment transactions suspected to involve proceeds from illegal activities.
- Suppliers requesting payment redirection to uncertified accounts.

All suspicious transactions, whether completed or not, must be reported for further investigation.

#### 4. Cash Transactions

Kuasar Kuyumculuk (Kurshuni) complies with applicable cash transaction limitations in all operating regions. Any cash transaction, or series of related transactions, exceeding \$5,000 (or local equivalent) must be reported to the appropriate government authorities.

#### Cash includes:

- Money orders.
- Cashier's checks.
- Payments for layaway or special orders that qualify as cash transactions upon merchandise transfer.

#### 5. AML Compliance Officer

Kuasar Kuyumculuk (Kurshuni) designates a Compliance Officer responsible for implementing and overseeing the AML/CFT Program. The Compliance Officer's duties include:

- Ensuring compliance with AML/CFT requirements.

- Advising the company on regulatory obligations.
- Providing training for employees to identify and report potential violations.

The Compliance Officer reports directly to senior management to ensure oversight at the highest level.

#### 6. Record Retention

All compliance activities, including due diligence, reporting, and risk assessments, are documented and retained for at least five years from the date of the last activity. This ensures regulatory compliance and audit readiness.

#### Eligibility and Reporting Expectations

This policy applies to all Kuasar Kuyumculuk (Kurshuni) employees, including full-time, part-time, temporary, and contractors. Employees are required to report suspected misconduct or non-compliance to their managers immediately. Failure to report violations may result in disciplinary action, including termination of employment.

#### Changes to this Policy

This policy will be reviewed and updated regularly by Kuasar Kuyumculuk (Kurshuni)'s Compliance Team to reflect changes in regulations and company operations.

#### Resources

For any questions or concerns regarding this policy, please contact the **Kuasar Kuyumculuk (Kurshuni) Compliance Department** at [compliance@kurshuni.com.tr](mailto:compliance@kurshuni.com.tr)

APPROVED BY THE CEO AND THE BOARD OF DIRECTORS

Kuasar Kuyumculuk Yapı San. Ve Tic. Ltd. Şti.

(Kurshuni Jewellery)



*PREPARED AND APPROVED BY KUASAR KUYUMCULUK (KURSHUNI) BOARD OF DIRECTORS*