

 ALPHA PLUS LIGATIO METALLICA	ANTI-MONEY LAUNDERING (AML) AND KNOW YOUR CUSTOMER (KYC) POLICY	Doküman No	PLT001
		İlk Yayın Tarihi	27.07.2025
		Gözden Geçirme Tarihi	05.01.2026
		Revizyon Tarihi	
		Revizyon No	
		Sayfa No	1/4

Scope: Alloy Production, Sales and Export of Precious and Base Metals

1. Purpose

The purpose of this Anti-Money Laundering (AML) and Know Your Customer (KYC) Policy is to ensure that Alfa Metal Alaşım San. ve Tic. Şti. operates in full compliance with Turkish legislation on the prevention of money laundering, the terrorist financing, and the prevention of financing of proliferation of weapons of mass destruction.

This policy establishes a risk-based AML and KYC framework and integrates OECD Annex II risk indicators as “red flags” into customer and transaction risk assessments, without replacing or duplicating any separate responsible sourcing or supply chain due diligence policies.

2. Legal and Regulatory Framework

This policy has been prepared in accordance with the following laws, regulations and standards:

National Legislation

- Law No. 5549 on the Prevention of Laundering Proceeds of Crime
- Law No. 6415 on the Prevention of the Financing of Terrorism
- Law No. 7262 on the Prevention of Financing the Proliferation of Weapons of Mass Destruction
- MASAK (Financial Crimes Investigation Board) secondary regulations, communiqués and guidance

International References

- International AML/CFT and KYC principles
- OECD Due Diligence Guidance – Annex II (used solely as a risk indicator framework for AML/KYC purposes)

3. Risk-Based Approach

Alpha Plus applies a risk-based approach to identify, assess, mitigate and monitor risks related to money laundering, terrorist financing and proliferation financing.

Risk assessments are conducted by considering:

- Customer risk
- Geographic/country risk
- Product and transaction risk
- Distribution channel and payment method risk

Risk classifications are documented and reviewed periodically.

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4. OECD Annex II Risk Indicators (AML/KYC Red Flags)

OECD Annex II risks are integrated into the AML/KYC system as risk indicators (“red flags”) that may point to elevated ML/TF risk.

4.1 OECD Due Diligence – Annex II Linked Red Flags

Enhanced scrutiny is applied where transactions or counterparties involve:

- Allegations or indications of severe human rights abuses, including forced labour or child labour
- Links to non-state armed groups, conflict financing or violent activities
- Indicators of bribery or corruption, particularly involving public officials
- False or inconsistent documentation, including misrepresentation of origin
- Transactions involving conflict-affected and high-risk areas (CAHRAs) without a reasonable explanation
- Indicators of illicit trade, smuggling, tax evasion or organized crime

These indicators do not replace MASAK obligations but support enhanced AML risk detection.

5. Enhanced Due Diligence (EDD) and Escalation

Where higher-risk indicators are identified:

- Additional information on source of funds / source of wealth may be requested
- Enhanced screening and adverse media checks are performed
- Senior management or Compliance Committee approval is required
- Ongoing monitoring intensity is increased
- High-risk cases are escalated to the Compliance Committee and decisions are documented

6. Customer Due Diligence (CDD) and KYC Requirements

Alpha Plus applies the following CDD measures proportionate to risk:

- Identification and verification of customers
- Identification of Ultimate Beneficial Owners (UBOs) for legal entities
- Verification of ownership and control structures using reliable documents
- Screening against sanctions, embargoes and watchlists
- Ongoing monitoring of customer relationships

6.1 Politically Exposed Persons (PEPs)

A Politically Exposed Person (PEP) is an individual entrusted with prominent public functions, including first-degree family members and close associates. Relationships involving PEPs are subject to:

- Enhanced Due Diligence (EDD)
- Senior management approval
- Increased transaction monitoring

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6.2 Cash Transaction Controls

Cash transactions are subject to threshold-based monitoring and enhanced scrutiny, considering transaction frequency, structuring risk and consistency with customer profile.

7. Suspicious Transaction Reporting (STR)

Alpha Plus maintains procedures to identify, assess and report suspicious transactions in accordance with MASAK regulations.

7.1 Identification of Suspicious Transactions

A transaction (completed or attempted) is considered suspicious where it:

- Is inconsistent with the customer's profile or declared activity
- Lacks an apparent economic or lawful purpose
- Involves unusual structuring, third-party payments or atypical payment methods
- Indicates potential money laundering, terrorist financing or proliferation financing

7.2 Internal Reporting and Assessment

- All employees must promptly report suspicions to the Compliance Committee
- The Compliance Committee assesses the case and documents its assessment

7.3 Reporting to MASAK

- Where required, STRs are submitted electronically to MASAK via the official reporting system
- STRs are submitted without delay regardless of whether the transaction is completed

7.4 Confidentiality and Tipping-Off Prohibition

- Information related to STRs is strictly confidential
- Customers and third parties must not be informed
- Any breach is subject to disciplinary and legal action

8. Recordkeeping

Alpha Plus retains AML/KYC records for at least eight (8) years in accordance with MASAK requirements. Records include, but are not limited to:

- Customer identification and verification documents
- Ultimate Beneficial Owner (UBO) records
- Risk assessments and scoring
- Transaction records and invoices
- STR documentation and internal assessments
- Training records
- Internal audit and compliance review reports

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9. Asset Freezing Procedures

In accordance with the applicable procedures on asset freezing and lifting such decisions, Alpha Plus implements:

- Suspension or return of delivery of assets subject to freezing decisions
- Immediate notification to relevant authorities, including (where applicable) Borsa Istanbul Precious Metals and Stones Market
- Responses to Ministry notifications within prescribed timelines (maximum 7 days)
- Reporting of assets that do not exist or cannot be registered
- Reporting upon lifting of freezing decisions

10. Roles and Responsibilities

- Board of Directors: Ultimate responsibility for effective AML/KYC implementation
- General Manager: Implementation, review and update of this policy
- Compliance Committee: Oversight of AML/KYC controls, STR reporting and risk management
- Employees: Mandatory compliance with this policy

11. Review and Approval

This policy is reviewed periodically and updated in line with legal, regulatory and risk-related developments.

APPROVED BY THE GENERAL MANAGER AND THE BOARD OF DIRECTORS.

Alfa Metal Alışım San. ve Tic. Ltd. Şti.


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