

## Anti-money laundering policy

Money laundering is the act of converting money or other monetary instruments derived from illegal activities into money or investments that look legal, so that their illegal source cannot be traced. Domestic and international law applies to Companies whose clients can deposit and withdraw funds from accounts.

OPAL BROKERS adheres to the highest standards in the fight against money laundering (AML) and the financing of terrorism. In this regard, the Company carries out a full-fledged set of activities aimed at detecting and countering the legalization of criminal proceeds and the financing of terrorism.

### Company procedures

Effective interventions are important for managing money laundering risks and financing terrorism. Client identification and verification procedures require, firstly, data collection and, secondly, verification of this data.

During the registration process at OPAL BROKERS, individual customers provide the following identification information for the Company:

- full name;
- date of birth;
- country of residence/location of the client;
- mobile phone number and email address.



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During the registration process at OPAL BROKERS, corporate clients provide the following identification information for the Company:

- full company name;
- registration number and date;
- country and address of registration;
- mobile phone number and email address.

After receiving the identification information, employees of the company check this information, requesting relevant documents.

Relevant documents for customer verification include, but are not limited to:

1. For an individual client: a scanned high-resolution copy or photograph of  
passport pages or any other national identity card indicating the name and surname (s), date and place of birth, passport number, date of issue and expiration, country of issue and signature of the client;
2. For corporate clients: a copy of documents in high resolution, confirming the  
creation of a legal entity, certificate of registration, and, where applicable, a license to conduct business. To confirm the client's address, the Company requires:
  - copy of utility bill (landline telephone, water, electricity) in high resolution for the last 3 months;



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- copy of tax bill from local government;
- copy of bank statement (for current account, deposit account or credit card).

If an existing client either refuses to provide the information described above, or if the Client intentionally provided misleading information, the Company, taking into account the risks, will consider closing any of the existing client accounts.

If a company assesses that a business relationship with a customer presents a high risk, it can apply the following additional measures:

- Require information regarding the source of funds or wealth;
- Require additional information from the client about the nature and purpose of the client's transaction with the Company.

When receiving information about the source of funds, company employees most often ask and carefully study employment status or business/profession. Employees of the company have the right to ask for all additional data for evidence, in particular the relevant supporting documents (employment contract, bank statements, letter from the employer, etc.).

The company will conduct ongoing customer checks and records of all business relationships with customers. Customers are required to provide current identification information and immediately report any changes to it. The client must inform the Company in a timely manner about changes in contact information or personal data. Documents must be translated into English by an official translator; the translation must be signed by the translator and sent along with a copy of the original document with a clear photograph of the client on it.

- OPAL BROKERS monitors suspicious transactions and customer transactions. OPAL BROKERS actions are based on the recommendations of the FATF (Financial Action Task Force on Money Laundering).
- The company does not under any circumstances accept or pay money in cash.
- The company reserves the right to refuse to conduct an operation at any stage if, in the opinion of the company, the operation may be related to money laundering or criminal activity.
- In accordance with international law, OPAL BROKERS is not obliged to inform the Client that the relevant authorities were notified of its activities as suspicious.

#### Customer Identification and Verification

OPAL BROKERS must ensure that it is working with a real person or entity. OPAL BROKERS takes all necessary measures in accordance with applicable laws and regulations that have been introduced by the monetary authorities. AML policy is implemented by:

- know Your Customer policies;
- monitoring customer activity;
- record keeping.

The company appoints an anti-money laundering enforcement officer who will be fully responsible for the program to combat money laundering and terrorist financing, and report to the board of directors or committee on any significant breaches of internal policies and procedures against money laundering.



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In addition to collecting customer information, OPAL BROKERS continues to monitor the activities of each customer in order to detect and prevent any suspicious transactions. A suspicious transaction is an operation that contradicts the client's legitimate business or its usual history of operations in accordance with the monitoring of the client's activities. OPAL BROKERS has implemented a monitoring system for these operations (both automatic and, if necessary, manual) in order to prevent criminals from using the company's services.

### Deposit and withdrawal

All customer operations for depositing and withdrawing funds from a personal trading account must meet the following requirements:

1. In the case of a bank transfer or a transfer from a bank card, the name indicated when registering an account must match the name of the account holder/bank card.
2. It is possible to withdraw funds from a trading account in a way different from the method of replenishment only after the withdrawal of an amount equal to the amount of customer deposits in the same way to the same account from which the replenishment was made.
3. In the case of account replenishment in a way by which withdrawal is not possible, withdrawals are made to the client's bank account, or by other means as agreed with the Company, by which you can reliably identify the account holder.
4. When replenishing an account in various ways, withdrawals are carried out in the same ways in proportion to the amount of deposits.



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