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### 1. OVERVIEW, PURPOSE AND SCOPE

We, Martur Fompak International, conduct business in an honest and ethical manner and have zero tolerance policy with regard to money laundering in all of our relationships and business dealings, where we operate.

This Anti-Money Laundering Policy establishes Martur Fompak International's commitment to prevent money laundering, financing of terrorism, and related financial crimes. The purpose of this Policy is to ensure compliance with all applicable international standards, local laws and regulations related to anti-money laundering and the prevention of financing of terrorism.

Therefore, we expect all our employees, including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners, to comply with and act in line with this Policy.

### 2. DEFINITIONS

**(Anti-)Money Laundering (AML)** refers to any conduct aimed at concealing or disguising the illicit origin, ownership, or control of money generated as a result of criminal activities or assisting any real person or legal entity involved in such conduct to evade the legal consequences of their actions. Accordingly, Anti-Money Laundering refers to all applicable laws, regulations, regulatory requirements, and internal policies and procedures intended to prevent, identify, and mitigate money laundering risks and to ensure compliance with applicable legal and regulatory obligations.

**Beneficial Owner** refers to the natural person(s) who ultimately owns or controls a legal entity of Business Partner and/or the natural person(s) on whose behalf a transaction or activity is being conducted.

**Business Partner Due Diligence** refers to the set of processes used to identify, verify, and assess the risks posed by any Business Partner with whom Martur Fompak International conducts business.

**Enhanced Due Diligence** refers to additional set of processes applied in high risk situations, including relationships involving Politically Exposed Persons, high-risk countries, or complex ownership structures.

**Financial Action Task Force (FATF)** refers to a comprehensive and consistent framework of recommendations which countries should implement in order to take action against money laundering and financing of terrorism.

**Financial Intelligence Unit** refers to a dedicated governmental authority, functioning as a connection between the private financial sector and law enforcement agencies. Its core mandate is to receive, analyze, and transmit Suspicious Activity reports, as identified by obliged entities.

**Financing of Terrorism** refers to the provision or collection of funds, from legitimate or illegitimate sources, intended to directly or indirectly support terrorism or related activities.

**Politically Exposed Person** refers to a natural person who is or has been entrusted with prominent public functions, as well as their immediate family members and close associates.

**Risk-Based Approach** refers to the actions, controls, and resources are applied proportionally to the level of risk identified, rather than treating all situations the same.

**Suspicious Activity** refers to any transaction or behaviour that deviates from normal or expected business activity and may indicate money laundering, financing of terrorism, fraud, corruption, or other financial crimes.

**Tipping-off** refers to the act of alerting someone that they are under investigation or that their financial activities are being scrutinised by law enforcement or regulatory authorities.

### 3. GENERAL PRINCIPLES

Martur Fompak International is committed to ensure full compliance with local and international AML laws and regulations, including but not limited to FATF Recommendations and EU AML Directives.

We adopt a Risk-Based Approach and maintain internal controls designed to detect, prevent, and report Suspicious Activities. All employees must act with integrity, transparency, and accountability and should immediately report with assurance of confidentiality and protection from retaliation as outlined in our Whistleblowing Policy.

### 4. BUSINESS PARTNER DUE DILIGENCE

Martur Fompak International shall take the Business Partner Due Diligence measures, in accordance with Risk-Based Approach, by taking into account the type of the Business activities of Business Partner, the relationship with Business Partner, financial instrument used and country and/or region of operation.

#### **4.1. Enhanced Due Diligence requirements**

This measure shall be applied to all relationships or transactions assessed as high risk, including those involving Politically Exposed Persons, high-risk jurisdictions, complex ownership structures, or atypical transaction patterns. Enhanced Due Diligence typically involves:

- More extensive verification of the identity, ownership structure, and business activities of the parties involved,
- Detailed examination of the source and legitimacy of funds,
- More frequent monitoring of transactions and business relationships,
- Additional checks on Politically Exposed Persons and their associates,
- Investigation of adverse media coverage and reputation, and
- Review of regulatory compliance and legal issues.

#### **4.2. Politically Exposed Persons**

Martur Fompok International shall determine whether a Business Partner and/or its Beneficial Owner, or any relevant individual qualifies as a Politically Exposed Person or not, including their immediate family members or close associates. Where a Politically Exposed Person is identified, Martur Fompok International shall:

- Apply Enhanced Due Diligence measures,
- Establish the source of funds, and
- Conduct enhanced monitoring on a Risk Based Approach.

### **5. REPORTING**

Where required by applicable law, Suspicious Activities or transactions shall be reported without delay to the competent Financial Intelligence Unit.

Employees are not required to determine the exact nature of the suspected offence; however, they must be able to clearly explain the reasons that led them to consider the activity unusual or suspicious. In addition, concerns must not be discussed with colleagues or with any person who is not directly involved in handling the report.

### **6. TIPPING-OFF PROHIBITION**

Employees are strictly prohibited from disclosing to the Business Partner or any third party the fact that a suspicious transaction report has been or will be filed or an investigation regarding AML is being conducted against them.

This prohibition includes any direct or indirect communication, behaviour, or action that could reasonably lead a Business Partner or any external party to suspect that a suspicious transaction report is being considered, prepared, or submitted. Employees must refrain from:

- Informing any person involved in the transaction that their activity is under review or has been escalated for AML purposes,
- Altering their normal interaction with the Business Partner in a manner that could reveal the existence of a report or investigation,
- Responding to inquiries regarding internal reviews, alerts, escalations, or reporting decisions, and
- Disclosing the identity of individuals involved in the review or reporting process.

Any breach of this prohibition may constitute a violation of applicable AML laws and internal policies and may result in disciplinary measures.

### **7. COMMITMENTS**

Employees including directors, Executive Committee members, and members of Board of Directors as well as all Business Partners play a critical role in safeguarding Martur Fompok International for AML and against financial crimes. At Martur Fompok International we commit to:

- Implement strong culture of ethical conduct and financial integrity across all operations,
- Ensure that relevant employees receive periodic AML training appropriate to their roles and responsibilities, in order to recognize and report Suspicious Activities,
- Enhance our internal controls and risk-management systems to ensure they remain efficient and aligned with current regulatory expectations,
- Conducting Business Partner Due Diligence measures with Risk-Based Approach,
- Business Partner Due Diligence, maintaining accurate records of identification, information and transactions, for a minimum period required by applicable law,
- Monitoring Suspicious Activities and reporting the same to relevant authorities in accordance with applicable laws,
- Promptly report any Suspicious Activities or unusual behaviour in good faith through in accordance with Martur Fompok International's Whistleblowing Policy.
- Cooperating fully with regulatory bodies and law enforcement,
- Monitoring up to date and applicable international sanctions lists (including EU and UN sanctions) and apply enhanced measures in relation to high-risk jurisdictions identified by the European Union, FATF, or national authorities.

## 8. VIOLATIONS AND CONSEQUENCES

By this Policy, we actively prevent and prohibit such aforementioned or similar conduct. Our zero-tolerance principle means; if such a conduct does occur, we will look into and review every allegation of violation, initiate appropriate action in response. If there is a discrepancy between the local regulations, applicable in the countries where our company operates, and this Policy, subject to such practice not being a violation of the relevant local laws and regulations, the stricter of the two, supersedes. Violation of this Policy may result in significant disciplinary actions including dismissal. If this Policy is violated by Business Partners or any third parties, their contracts may be terminated.

This Policy will be periodically reviewed by the Legal and Compliance Team to ensure compliance with new or revised laws and regulations. Failure by management or governing bodies to ensure effective implementation of this Policy may result in administrative, civil, or criminal liability, in accordance with applicable legislation.