

ANTI-MONEY LAUNDERING POLICY

Money laundering is the cover-up of illegal resources by converting them into cash or ostensibly legitimate investments.

As Bitci, we take the issue of providing the best customer service to our customers very seriously, including giving great importance to account security. In order to prevent money laundering, we strictly follow AML (Anti-Money Laundering) Policy under any circumstances. In this context, the Anti-Money Laundering Policy (hereinafter referred to as “AML Policy”) outlines the procedures and mechanisms established by Bitci to prevent money laundering.

The purpose of the Anti-Money Laundering Policy is; with a risk-based approach, reducing the risks by evaluating the customers, transactions and services of the Bitci Teknoloji A.Ş., raising the level of awareness of the employees about the prevention of money laundering and financing of terrorism and obtaining information in this regard, and in this context, informing the customers that the Company carries out its activities in accordance with the current legislation, especially the Law No. 5549 Prevention of Laundering Proceeds of Crime and the Law No. 6415 on the Prevention of the Financing of Terrorism.

Within the scope of this AML Policy, the customers to whom this AML Policy is implemented on to not to harm the Company’s activities refers to the real persons who are members of the Platform (“Platform”) that can be accessed via www.bitci.com and those who benefit from the services offered on the Platform and therefore those who accept the matters in this AML Policy.

In accordance with the international legal norms and standards and applicable legislation, Bitci has prepared its AML Policy and in this regard it has taken many measure such as verifying the identities of all customers to a reasonable extent, applying a risk-based approach to monitoring client transactions, notifying the relevant institutions and organizations of any suspicious transactions carried out by the customers within the framework of the current legislation and recording these transactions accordingly, and establishing the necessary organization to coordinate the implementation and applicability of the AML Policy at the Company.

Accordingly, Bitci follows the following policies:

Not to enter into business relations with criminals and/or terrorists;

Not to process transactions arising from criminal and/or terrorist activities;

Not to facilitate any action related to criminal and/or terrorist activities.

Risk Assessment

In line with both national and international requirements, Bitci adopts a risk-based approach to money laundering and financing of terrorism. Therefore, measures to prevent money laundering and financing of terrorism are commensurate with identified risks and allow the effective devotion of the resources. Resources are used on a priority basis and the greatest risks are given the highest consideration.

Since Bitci adopts a risk-based approach in monitoring the financial activities of its customers, in order to prevent money laundering and financing of terrorism, it may perform risk analysis with the following methods and monitor the relevant customers within the framework of the information obtained as a result of the risk analysis.

Customers and transactions in the high-risk group are as follows:

If the total amount of a single cryptocurrency transaction or multiple linked transactions is equal to or more than 100.000,00 TL;

If the total amount of a single cryptocurrency exchange or multiple linked exchanges is equal

to or more than 100.000,00 TL;

In cases where it required to report the suspicious transactions within the framework of current legislation;

If there is any doubt about the accuracy and adequacy of previously acquired identity information;

In cases of complex transaction that have the potential to hide third party beneficiaries;

Where the financial funds cannot be easily verified;

Unusual transactions without an economic or apparent legitimate purpose.

Transaction Monitoring

Monitoring customers' transactions and analyzing the obtained data is also an important tool for risk assessment and detection of suspicious transactions. In case of suspicion of money laundering, Bitci has the right to monitor all transactions (customers in the high-risk group and transactions of those, complex and unusual transactions, transactions to and/or with the high-risk countries) and has the right to:

Report suspicious transactions to the relevant law enforcement authorities;

Request the customer to submit additional information and documents;

Suspend or to terminate customer's account;

The list provided above is not an exhaustive one. The AML Policy Compliance Personnel monitors customers' transactions on a daily basis and determines whether to report the customers and to consider them suspicious.

Know Your Customer Policy

Detailed information about the Know Your Customer Policy can be found via the link <https://www.bitci.com/legals/kyc/>.

Verification Procedure

Bitci establishes its own procedures to determine anti-money laundering standards and compliance with its Know Your Customer (KYC) Policy.

Bitci customers have to complete a verification procedure (they have to present a government-approved identity document: passport or ID). For the purposes of the AML Policy, Bitci reserves the right to collect the identity information of its customers. This information is processed and securely stored in accordance with the Bitci User Clarification Text and User Agreement.

Bitci may request a second customer ID document (a bank receipt or electricity/water bill not longer than 3 months that contains the customer's full name and real address).

After confirming the accuracy of the documents and information submitted by the customer, Bitci reserves the right to request additional information about the customer identified as dangerous or suspicious.

If the identity information of the customer has been changed or his/her activities have been found suspicious, Bitci reserves the right to request updated documents from the customers, even if his/her identity has been verified before.

Reporting

Within the framework of the services provided by Bitci, in cases that raise suspicion regarding money laundering and financing of terrorism, in accordance with the current legislation and regardless of the amount, the transactions that are determined as suspicious as a result of the necessary investigations are reported to Financial Crimes Investigation Board. The real persons who carried out the suspicious transaction and their legal representatives, the

managers and personnel who do not comply with the obligation to report the suspicious transactions will be responsible for all kinds of legal, administrative and criminal sanctions.

Anti-Money Laundering Personnel

Anti-Money Laundering Personnel is a Bitci employee who is responsible to ensure the compliance with the AML Policy. Anti-Money Laundering Personnel is assigned to:

Collect customers' identification information,

Establish and update internal policies and procedures for generating, reviewing, submitting and storing all necessary reports in accordance with current laws and regulations,

Monitor and analyze significant deviations from customers' unusual activities,

Implement a record management system for recording and retrieving documents, files, forms and log session entries,

Regularly update the risk assessments.

Training, Updating and Internal Audit

With the personnel policy and procedures, it has issued in accordance with the current legislation, Bitci fulfills all its obligations within the scope of training. In this context, it provides many trainings to its personnel, especially the Anti-Money Laundering Procedures, and ensures that this information is kept up-to-date.

Bitci periodically audits whether its activities related to the "Law Against Money Laundering and Terrorism Financing", regulations and communiqués are following the current legislation, Company policies and procedures.