Arçelik

GLOBAL ANTI-MONEY LAUNDERING POLICY

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The aim of this policy is to set forth guidelines to prohibit and actively monitor the money laundering and the funding of terrorist or financial crimes that Arçelik and its subsidiaries ("Company") and its all third parties may face within the scope of their business activities. Within this concept, all operations of the Company are made in accordance with the key components of a program which includes; identification and verification of clients and third parties; monitoring of client activities; reporting and investigating unusual and suspicious activities; training staff in money laundering prevention and detection; and designating dedicated money laundering reporting officers.

This Policy has been prepared in accordance with Global Code of Conduct and the local laws and regulations, which are applicable in the countries that Arçelik operates to ensure the commitment to all relevant local and international laws and regulations (i.e Terrorist Financing Act, POCA (Proceeds of Crime Act), Money Laundering Acts). This Policy applies to all employees of Arçelik who are required to comply with all applicable anti-money laundering and terrorist financing laws and regulations in countries which Arçelik conducts business. Failure to do so may result in severe criminal, civil and regulatory penalties for Arçelik and its employees.

1. DEFINITIONS

Money laundering is the disguising or concealment of financial assets obtained via illegal means. It is an attempt to illegally legitimize criminal proceeds and disguise the true origin of assets, this is commonly achieved by placement, layering and integration. Money laundering may be committed through knowingly engaging in a financial transaction with the proceeds of a crime or negligent ignoring warning signs for unusual or suspicious activity in respect of a client or transaction.

Terrorist financing refers to activities that ensures financial support to of legitimate or illegitimate terrorists, individuals, groups, organizations or supporters of terrorism. Terrorism can be financed through illegal activity such as credit card fraud, illegal arms dealing and drug dealing, among other criminal activity. Terrorist financing may also involve the use of legitimately derived funds. In both instances the aim of terrorist financiers is to conceal the source and ultimate use of finances. As with money laundering, the appearance of being connected, directly or indirectly, to terrorism raises unacceptable levels of regulatory and reputational risk to Arçelik.

Politically Exposed Persons (PEPs) are individuals who are, or have been, entrusted with prominent public positions domestically or by a foreign country. For example, Heads of State or Heads of Government, senior politicians or government officials, judicial or military officials, senior executives of state owned corporations, prominent political party officials.

Sensitive Countries are the ones which have strategic Anti Money Laundering /Combatting Financing of Terrorism deficits that have not made adequate progress in addressing the deficits or have not stipulated to an action plan as per the Financial Action Task Force (FATF).

Sensitive Clients are the individuals or legal entities which have business relations with sensitive countries.

Facilitation payment is made to further "routine governmental action" that involves non-discretionary acts. Examples of "routine governmental action" include processing visas, providing police protection or mail service, and supplying utilities like phone service, power, and water. Routine government action does not include a decision to award new business or to continue business with a particular party. Nor does it include acts that are within an official's discretion or that would constitute misuse of an official's office. Thus, paying an official a small amount to have the power turned on at a factory might be a facilitating payment.

If you have any questions or further inquiries regarding the above, please consult to the Global Compliance Manager.

2. SUSPICIOUS ACTIVITIES

Arçelik employees should be vigilant of money laundering red flags and to report any suspicious activity to local compliance officers. By way of guidance, see below a non-exhaustive list of red flag scenarios.

- Suppliers, customers or third parties who do not provide complete information, false or suspicious information, or is anxious to adhere to reporting or recordkeeping requirements,
- Customers who willfully agree to pay above the market conditions,
- Customers or suppliers who request the payments to be conducted in cash or cash equivalents,
- Transactions relating to high-risk countries, as defined by the FATF,
- Abnormal cash transfers, incompliant with the business rationale of the related transaction,
- Multiple money orders, traveler's checks, or large amounts of cash,
- Payments made in currencies other than those specified in the agreements,
- Payments requested to or by third parties, who are not named in the corresponding contracts,
- Unusual receipt of transactions from a certain person or entity, where the origin of the funds is not known,
- Payments to persons or entities who reside in countries known as "tax heavens" or into "shell bank" accounts, or unusual fund transfers to or from foreign countries unrelated to the transaction,
- Payments to or from entities in which, it is not possible to identify the shareholding structure or ultimate beneficiaries.

When you are in doubt, please ask help from Global Legal and Compliance Department for guidance.

3. KNOW YOUR CLIENT ("KYC")

Arçelik and its employees are required to exercise a level of care and due diligence when dealing with clients to avoid being willfully blind to money laundering or other suspicious activity. Consistent with this, Arçelik and its employees must adhere to the following principles:

- Sufficient information about the business environment and the purpose of the intended business of the third parties must be procured,
- Money laundering risks related with third parties must be assessed for aims of monitoring the third parties' activities,
- The integrity of potential customers and other business relationships must be assessed,
- The owner, business manager and key principals must be checked against watch lists and reputational intelligence through local investigators,
- Media research in English and also the local language about the owner, business manager and its key principals must be conducted,
- The ongoing monitoring based on the risk profiles of customers, suppliers and distributors must be performed,
- Arçelik's compliance expectations must be communicated to the stakeholders at all times,

In case there are reasons to be suspicious on the business partners because of wrongdoings pertaining to dealings, interactions, transactions with Arçelik, those suspicions must be reported to the Global Compliance Manager, immediately, for further investigations.

4. ROLES AND RESPONSIBILITIES

All employees must follow the requirements set forth in this Policy. This Policy is published by Finance Department and it takes any corrective and/or preventative actions to be taken against any non-compliant behavior including termination of employment. Compliance Officers are employees of the Company appointed by the Chief Legal and Compliance Officer of Arçelik as being responsible for monitoring the Company's operations pertaining to this Policy.

This Policy will be periodically reviewed by the Arçelik Legal and Compliance Department to ensure compliance with new or revised laws and regulations.

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