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1. INVESTMENT FUND TRANSACTIONS

1.1 FUND TRANSACTIONS NOT INCLUDED IN TURKEY ELECTRONIC FUND TRADING PLATFORM (TEFAS)

Transmission of orders activity refers to the transmission of client orders related to capital market instruments to another authorized investment institution by the Bank and informing the relevant clients about the results of the orders. Our bank carries out its mutual funds transaction brokerage activities for investment funds (that are listed in TEFAS) with TEFAS whereas our bank processes short-term bond fund and liquid fund orders, that are not enlisted on Türkiye Elektronik Fund Trading Platform, via Ak Portfolio Management Corp.

1.1.1 TURKEY ELECTRONIC FUND TRADING PLATFORM (TEFAS)

While funds previously only founded by Ak Portföy could be sold to our clients, together with TEFAS, funds of other institutions and banks could also be sold.

By the help of TEFAS, branches, direct internet and mobile banking channels and other bank funds can be bought and sold.

Information on funds traded in TEFAS can be found on the website www.tefas.gov.tr. Information, analysis and comparative performance information about funds are also available on the site. Purchase and sale requests of mutual funds belonging to other institutions, rather than Ak Portföy Corp. can only be made during platform hours (08: 45-13: 30 for same day value fund transactions, 08: 45-11: 30 for half-days; 08:45 for forward value fund transactions; 17:30, on half-days 08: 45-12: 30) within the framework of the investment fund rules of the institution where the transaction is made.

Ak Portföy A.Ş. Purchase and sale requests for funds are received 24/7.

1.1.2 Investment Funds in Our Bank

Individual Banking Services Agreement provided for clients who want to buy mutual funds and once this agreement is signed by Clients, investment account is opened in Akbank. Legitimacy testing is not required for TEFTP Investment Funds.

Pursuant to the communiqué on the Procedures and Principles of Keeping Records Regarding Capital Market Instruments, It is obligatory to notify the Central Securities Depository (CSD) regarding names and details of our clients who have a securities account in our bank. The issues to be considered regarding the registration process from CSD are given below:

- Regarding buying / selling transactions, the client must have a securities account linked to the demand deposit account that the client will want to trade.
- It is required that transactions must be made from the securities account to which the demand deposit account is linked.
- If an financial instrument is associated with an investment account with CSD registration the account number of the current security must be checked before opening a new securities account. In case the account number to which it is connected is closed or if the account number is required to be changed using the "Investment account update" field from the Investment Transactions menu (transactions can be completed immediately without the need to open a new securities account.)
- If there is no security account to which a demand deposit account is linked, new securities account must be opened since funds cannot be bought / sold over this account.
- After completing the purchase of the CSD Registration Number for newly opened securities accounts, purchases can be made.
- CSD registry number is taken separately for each securities account.
- Separate transactions are required for all securities accounts under Mortgage Backed Bonds. For instance; while the CSD registration status of the security account number A under a Mortgage Backed Bond is "CSD Received" whereas If the securities account number B is "not registered in CSD", the system will not allow to buy / sell funds and task interruption is assigned.
All securities under Mortgage Backed Bonds must be checked as follows and notification must be made for each account that does not have a securities registry.
- In fund purchase / sale transactions, the following selections are made on the Integro screen, in order, for the securities account linked to the demand deposit account to be traded: The relevant account detail is selected from the Investment Account Update function under the Investment Transactions menu, and the "CSD" button is clicked on the displayed screen and CSD information is displayed. On the displayed CSD information screen; the screen should appear as "CSD Registered". Yet, Even if there is a registry in the "CSD Registration Number" field, if "CSD Not Received" is checked, no transaction will be made.

1.1.2.1 Monetary (Liquid) Fund and Short Term Liability Tools Fund Sales/ Client Fund Purchase

It is required to check whether the fund is in stock or not and this check shall be done through the system. Orders placed after 14:00 may not have any stock left.

The client signs the fund sales transaction on the "transaction order form" generated by the system during the transaction and this document is scanned to electronic branch. The investor information form is shared with the client.

1.1.2.2 Selling Funds (On Call) / Client Purchase

The client is presented with the Investor Information Form of the fund he has selected and a promotional document of the fund prepared by Ak portfolio, if any. Information about the price and transaction values of the fund to be purchased are also provided.

The client signs the fund sales transaction on the "transaction order form" generated by the system during the transaction and this document is scanned to electronic branch. After when the transaction is realised on effective date, transaction result forms can also be issued to clients if clients request them.

1.1.2.3 Fund Buying: Capital Market (Liquid) Fund and Short-Term Debt Instruments Fund Buying-Client's Fund Sale

The price of the fund is taken from the system and submitted to the client.

The client signs the fund sales transaction on the "transaction order form" generated by the system during the transaction and this document is scanned to electronic branch. If clients request, the transaction result form that received at the time of the transaction can also be submitted to the clients.

Fund purchase from the client is made on the same day and the amount of TL in return for the fund amount is recorded in his/her account

1.1.2.4 Fund Purchase (on Call Funds) Buying Funds by Client.

The client is informed about the price and transaction values of the fund he/she wants to sell.

The client signs the fund sales transaction on the "transaction order form" generated by the system during the transaction and this document is scanned to electronic branch. After the sale process is realized, the transaction result form can also be presented to the clients upon request

1.1.2.5 Advanced Pricing Method in Investment Funds

Future pricing, in brief, is the purchase and sale of participation certificates at the price calculated after receiving the purchase-sale order from the investor. In future fund buying and selling transactions, transactions are made without knowing the price at which the transactions will take place and prices in the system appearing at the time of the transaction are the most up-to-date prices of the funds at that moment.

2. SHARE / WARRANT / PRE-MARKET TRADING PLATFORM / FREE TRADING PLATFORM TRANSACTIONS

Order transmission activities will be carried out by the Bank for Pay / Warrant / PMTP Pre-Market Trading Platform (PMTPT) / Free Trading Platform (FTP) products. The work flow differs depending on whether the client is an existing client or a new client. The workflow differs depending on whether the client is an existing client or a new client. Clients with an investment account prior to the start of the compliance period are defined as "current clients." whereas clients who do not have an investment account before the start of the compliance period and clients who open a new investment account are defined as "new clients"

1) If the client trades from the branch, the workflow shall be as follows:

During the compliance period, it will not be obligatory for existing clients to sign the new BBHS / THS and General Risk Notification Form for Pay / Warrant / (PMTPT) / PMTPFTP transactions, which include Conflict of Interest Policy clauses. At the end of the compliance period, it will be mandatory to obtain a new BBHS / THS and General Risk Notification Form, which includes the articles of the Conflict of Interest Policy, in order to conduct transactions of existing clients.

- For existing clients; login to the bank system by branch staff is performed so that a warning shall be assigned by the system after an updated Fixed Income Security check
- The new Retail Banking Service Agreement / Technology Service Contract, General Risk Notification Form and Product Based Risk Notification Form containing the articles of Conflict of Interest Policy are filled and signed by the clients without current Retail Banking Service Agreement/Technology Service Agreement. General Risk Notification Form and Product Based Risk Notification Form can also be obtained via Internet Banking Channel.
- General Risk Notification Form and Product Based Risk Notification Form are scanned and entered into the system.
- For new clients; With the client's request for the product, the new BBHS / THS and General Risk Notification Form, which includes the articles of the Conflict of Interest Policy, is filled and signed by the client, and the General Risk Notification Form is scanned into the system and stored
- For Share / Warrant / (PMTPT) / PMTPFTP transactions, it is checked whether the client has an investment account.
- For clients who do not have an investment account, an investment account is opened at Ak Yatırım through the Bank upon client request. The opened account is associated with a demand deposit account in Akbank.
- For existing clients with investment accounts, relevant warnings will be given in the share functions and trading menus.
- Regarding Pay / Warrant / (PMTPT) / PMTP / FTP transactions, the client is asked to fill in an order and the order is signed.
- Depending on whether the transaction to be made is Pay / Warrant / (PMTPT) / PMTPFTP, a Product Based Risk Notification form is also made by the client to fill in and sign it.
- It is checked whether the client has Compliance and Legitimacy tests and the tests are completed for clients who do not have Compliance and Legitimacy Tests. Compliance and Legitimacy Tests will not be applied to legal entity clients.
- Compliance and Legitimacy Tests It can also be done through internet banking; If it is done by our branches, the Compliance and Legitimacy Test is filled and signed by the Client and the answers are entered systematically. The resulting form is printed in 2 copies and signed by the Client; one copy is delivered to the Client and scanned in the system after approval.
- In line with the result of the Client Suitability Test, action can be taken for the appropriate product.
- According to the result of the Client Suitability Test, it can receive investment consultancy service through Ak Yatırım.
- Clients who wish to purchase products that do not comply with the results of the Compliance Test must return to the test section again and make a written statement by ticking the "I accept the risk arising from this transaction" box in the test and the declaration must be defined in the system.
- The banking system transfers the results of the Compliance and Appropriateness Tests to the Ak Yatırım system simultaneously.
- A copy of each Client signed General Risk Notification Form and Product Based Risk Notification Form is delivered to the Client. If the General Risk Notification Form, Product-Based Risk Notification Forms, Compliance Test and Appropriateness Test are received via Internet Banking, it is printed and delivered from the system upon request by the Client.
- The Stock Framework Agreement and the Investment Consultancy Agreement are signed by the Client and scanned into the system. It is marked as "Receiving Investment Advisory" from the bank system.
- In case of application for warrant / PMTP / FTP transaction, it is marked "Can make a warrant, PMTP or FTP transaction" from the bank system in terms of transaction type.
- During the relevant marking, the General Risk Notification Form, Product Based Risk Notification Form, Compliance and Legitimacy Tests will cut the business in the system.
- The account is opened with the system entries indicating that you can make Pay, Warrant, PMTP or FTP transactions.
- With the completion of the entry of the share transactions into the Bank system, the Client order is signed by the Client, scanned into the system and archived. Since Private Banking Branches receive orders over the registered phone, no order is issued.
- No Client orders are generated as warrant / PMTP / FTP transactions are performed only on the Instant Exchange and Investor screens. It is mandatory to have cash in the Client accounts for the relevant transactions, and if there is no cash, the transaction will not be possible.

For professional Clients, product-based risk notification forms are optional and no warning or business interruption messages are given. For professional Clients, obtaining the "Information Form on Regulations Provisions That Professional Clients Cannot Benefit from" will be a pain.

Share Order Transmission Channels;

Akbank Direct Banking Channels:

- Akbank Mobile
- Akbank Internet
- Instant Exchange
- Investor Mobile
- Client Contact Center
- Branch (1st Degree Licensed Client Representatives can take orders without investment consultancy.)
- Data Broadcast Screens

Warrant / PMTP / FTP Order Transmission Channels;

Akbank Direct Banking Channels:

- Akbank Internet (Instant Exchange)

2.1 SHARE PUBLIC OFFERING PROCEDURES

An IPO request form is received from the Client. If the Client has sufficient collateral in the Akbank system, the necessary information is entered through the system and the requests are forwarded to Ak Yatırım. Demand collection and collateralization transactions are carried out automatically by the Bank system, while demand distribution transactions are carried out by Ak Yatırım.

Public Offering Demand Collection Channels are as follows:

- Akbank Mobile
- Akbank Internet
- All Akbank Branches
- Client Contact Center

2.2 ORDER SUBMISSION / AMMENDMENT / CANCELLATION

In purchasing transactions, the amount of collateral to meet the blockage rate defined to the Client must be kept in the linked demand deposit account. While collateral transactions are carried out by the Bank, order transactions are carried out by Ak Yatırım. Order Transmission is made to the client's Ak Yatırım Stock Account through the Bank system.

Based on the authority granted by the Capital Market and BIST legislation, the branches can receive orders for purchase and sale of stocks electronically or in writing and / or verbally, by receiving instructions from the Client for order change / order transmission transactions.

In the banking system, transactions are carried out by Private Banking branches on the Ak Yatırım / Geneks screens.

Orders collected through Akbank channels are transmitted to the Ak Yatırım system by the Akbank system after Client collateral / asset control is performed. Ak Yatırım transmits incoming orders to Borsa İstanbul. Confirmations of the orders transmitted are forwarded to Ak Yatırım by Borsa İstanbul and to Akbank by Ak Yatırım.

The order that is created as a result of the transaction by the branches is signed by the Client and scanned into the system. Since Private Banking Branches receive orders over the registered phone, no order is issued.

In order to collect the debts arising from the purchases made by the Clients, the related accounts in the Bank are scanned by the Ak Yatırım system on the day of settlement. If sufficient amount is found, the debt is collected. If they are not found, the debt amounts of the Clients remain in their accounts at Ak Yatırım.

2.3 DIVIDEND / FEE AND FREE CAPITAL INCREASE

Dividend, payment and bonus capital increases are carried out by Ak Yatırım, and in case of a paid capital increase, the relevant amounts are deposited by the Client into the relevant account.

2.4 SHARE SALES TRANSACTION

In case of a share sale transaction, the amount is transferred to the drawing account to which the Akbank Yatırım account is linked. The relevant amount is accrued according to the feature of the drawing account to which the Ak Yatırım account is linked. For Clients who do not want to be credited, the remuneration feature is removed from the system by obtaining a Client instruction.

2.5 KMK / OPEN SALE OPERATIONS

For Margin Securities transactions, the Framework Agreement for Margined Securities and Limit Form is signed by the Client. Client request and contract are forwarded to the Ak Yatırım Margin Securities team.

For short selling transactions, the Short Sale and Lending Framework contract is signed by the Client, scanned and sent to the Ak Yatırım Margin Securities team. The investment account is updated and marked as short selling. Client request is directed to Ak Yatırım Margin Securities team.

3. FORWARD TRANSACTIONS AND OPTIONS MARKET TRANSACTIONS (VIOP)

Order transmission activities will be carried out by our bank for VIOP products. The work flow differs depending on whether the Client is an existing Client or a new Client. Compliance period Clients with an investment account prior to commencement are current Clients; Clients who do not have an investment account and open a new investment account before the start of the compliance period will be considered new Clients.

In case the Client applies to our branches, the work flow is as follows:

During the compliance period, it will not be obligatory for existing Clients to sign the new BBHS / THS and General Risk Notification Form for VIOP transactions. At the end of the compliance period, receiving the new BBHS / THS and General Risk Notification Form containing the articles of the Conflict of Interest Policy and scanning the relevant forms to the system in order to make VIOP transactions of existing Clients will be a cut off.

For existing Clients; Upon logging into the Bank system by the branch personnel, an up-to-date BBHS / THS check is made and a warning is given.

New BBHS / THS and General Risk Notification Form containing the articles of Conflict of Interest Policy are filled and signed by Clients who do not have current BBHS / THS. In addition, General Risk Notification Form and Product Based Risk Notification Forms can also be obtained via Internet Banking.

General Risk Notification Form is scanned into the system and entered.

For new Clients; With the Client's request for the product, the new BBHS / THS and General Risk Notification Form, which includes the articles of the Conflict of Interest Policy, is filled and signed by the Client and entered into the system by scanning.

For VIOP transactions, it is checked whether the Client has an investment account.

For Clients who do not have an investment account, Ak Yatırım opens an investment account upon Client request. The opened account is associated with a demand deposit account in Akbank.

It is checked whether the Client has Compliance and Suitability tests, and Compliance and Legitimacy Tests are performed for Clients without Compliance and Legitimacy Tests. Compliance and Legitimacy Test will not apply to legal person Clients.

Compliance and Legitimacy Tests can also be done through Internet Banking; If done by our branches, Compliance and Legitimacy Tests are filled and signed by the Client and the answers are entered systematically.

The resulting result form is printed in 2 copies and signed by the Client, one copy is delivered to the Client and scanned into the system after approval.

The Client will be able to take action for the product that is eligible in line with the Compliance Test result.

According to the result of the Client Compliance Test, investment consultancy service will be available through Ak Yatırım.

Clients who want to purchase products that do not comply with the results of the Compliance Test will return to the test department again and make a written statement by ticking the box "I accept the risk arising from this transaction" and the declaration is defined in the system, then the Client will be able to purchase the requested product.

Bank system transfers the results of the Compliance and Suitability tests to the Ak Yatırım system simultaneously.

Depending on the product requested by our branches, the Product Based Risk Notification Form is signed by the Client.

One copy each of the Client signed General Risk Notification Form and Product Based Risk Notification Form is delivered to the Client. If the General Risk Notification Form, Product Based Risk Notification Forms, Compliance Test and Appropriateness Test have been taken over Internet Banking, it is printed on the system and delivered to the Client upon request by the Client.

Clients will not be able to receive investment consultancy services even if the Appropriateness Test is eligible.)

For existing Clients with investment accounts, relevant warnings will be given when the account will be marked as eligible for VIOP or during the transaction.

Orders are filled and signed by the Client regarding VIOP transactions.

The investment account is updated and marked as "VIOP can be traded".

Compliance and Suitability Test, Product Based Risk Notification Form and VIOP Framework Contract are scanned into the system and sent to Ak Yatirim Operations Department for approval.

The documents are checked and approved by Ak Yatirim Operations Department.

For professional Clients, product-based risk notification forms are optional and no warning or interrupting messages are provided. For professional Clients, obtaining the "Information Form on Regulations Provisions That Professional Clients Cannot Benefit from" is not necessary.

VIOP Order Entry Channels;

- Akbank Internet
- Instant Exchange
- Investor Mobile
- Data Broadcast Screens
- Ak Yatirim Branches

3.1 ORDER TRANSMISSION PROCEDURES

If the Client has a certain asset volume and is eligible for investment consultancy service, they are directed by the Bank to Ak Yatirim to receive investment consultancy services only.

Based on the authorization given by the Capital Market and BIST legislation, VIOP purchase and sale orders can be received electronically or in written and / or verbally.

Orders collected through the bank are transmitted to Ak Yatirim through the system. Ak Investment transmits the orders to its system to Borsa Istanbul. Confirmations of the orders transmitted are forwarded to Ak Yatirim by Borsa Istanbul and to the Bank by Ak Yatirim.

Collateral control of orders is carried out by Ak Yatirim system at the stage of collecting orders in the Bank. If the collateral is insufficient, orders are rejected and not forwarded to Borsa Istanbul.

3.2 MARGIN PROCEDURES

In order to make VIOP transactions, Clients can send their collaterals in Akbank to their Takasbank accounts via Akbank Direct Internet or Akbank branches.

Collateral completion obligation (Margin Call) "occurs for Clients whose initial margin falls below 100%. Information flow is provided from the Takasbank system to the Ak Yatirim system and from the Ak Yatirim system to the Akbank system. The collateral completion can be carried out by our branches or by the Client via the Internet branch. For the collaterals that are not completed until the specified time on the relevant day, Ak Yatirim performs the completion process by performing a reverse transaction.

4. FIXED INCOME SECURITY TRANSACTIONS (CORPORATE BONDS / TREASURY BILLS / GOVERNMENT BONDS / EUROBOND / LEASE CERTIFICATE)

- FIXED INCOME SECURITY transaction service can be provided to clients as an intermediary for order transmission.
- Clients can submit their FIXED INCOME SECURITY purchase and sale requests through branches or directly through the Treasury Business Unit. FIXED INCOME SECURITY purchase-sale requests of the branch are concluded after the transaction is completed without associating it with the bank portfolio. The work flow in the aforementioned process is as follows.
- For existing clients; Upon logging into the Bank system by the branch personnel, an up-to-date BBHS / THS check is made and a warning is given.
 - New BBHS / THS, Investment Services and Activities General Risk Notification Form and Debt Instruments Risk Notification Form are filled and signed by clients who do not have current BBHS / THS. Forms are scanned into the system and entered.
 - Investment Services and Activities General Risk Notification Form and Debt Instruments Risk Notification Form can also be obtained via Internet Banking. If the form is received via Internet Banking, it is printed and delivered from the system by the branch personnel upon request by the client.
- For new clients; Upon the client's product request, The new Retail Banking Service Agreement / Technology Service Agreement, Investment Services and Activities General Risk Notification Form and Debt Instruments Risk Notification Form is filled in and signed by the client, scanned and entered into the system.
- For the brokerage process, the client has the instructions filled and signed.
- It is checked whether the client has an investment account for the transaction.
- For clients who do not have an investment account, an investment account is opened upon client request.
- It is checked whether the clients with an account opening or existing investment account have CSD registry.
- For clients who do not have CSD registration, CSD registration is obtained.
- The cash / nominal balance of the client accounts to be processed is checked. If the client arrives through the branch channel, the branch personnel reports a transaction directly to the Treasury Business Unit. If there is a deficiency, information is sent to the branch and it is completed.
- The client can send the order request directly to the branch or to the Treasury Business Unit. The request of the client is forwarded to Ak Yatirim by the Branch or the Treasury. Orders are taken from registered phones. Ak Yatirim notifies the transaction result to the branch or the Treasury Business Unit that transmits the order.
- When the product to be processed is selected, the system checks whether the Compliance Test is mandatory for the relevant product, and a break-in message is given to clients who do not have a Compliance Test.
- The Compliance Test can also be done through Internet Banking, and if it is done by our branches, the Compliance Test is filled and signed by the client and the answers are entered systematically. Compliance and Legitimacy Test will not apply to legal person clients.
- The resulting result form is printed in 2 copies and signed by the client, one copy is delivered to the client and scanned into the system after approval.
- In line with the result of the Client Suitability Test, action can be taken for the appropriate product. Accordingly, if a product not suitable for the Compliance Test result is selected, a break-in message is given.
- In case the client wishes to perform a transaction different from the profile determined by the test result, the client makes a written statement "I accept the risk arising from this transaction" and the relevant area is defined in the system.
- At the same time, depending on the product requested with the transaction entry, it is systematically checked whether the Debt Instruments Risk Notification Form is available, and a business interrupter message is given. In case of a warning, the Debt Instruments Risk Notification Form is signed by the client.
- Debt Instruments Risk Notification Form is optional for professional clients and interference message is not given. For professional clients, obtaining the "Information Form on Regulations Provisions That Professional Clients Cannot Benefit from" will be a pain.
- One copy of the General Risk Notification Form and Debt Instruments Risk Notification Form signed for all clients is delivered to the client. If General Risk Notification Form and Debt Instruments Risk Notification Form are received via Internet Banking, they are printed and delivered on the system upon request by the client.
- Information about the brokerage transaction received from the Back Office, Marketing unit and the actual transaction; If not, it checks with the document received from the authorized institution for portfolio brokerage. The ISIN code, nominal / monetary amount, price, transaction commission rate of the asset to be bought / sold must be checked.
- The cash / nominal balance of the client accounts to be processed is checked, if there is a deficiency, information is sent to the branch and it is completed.

- When the client's investment account becomes available, the transaction is approved by Akbank Back Office.
- For the clearing obligation with BIST, Ak Yatırım performs mutual cash / security transfers. (Trade Registration Service)
- In the client asset sales transaction; A transfer is made from the Akbank client account to the Ak Yatırım account at CSD. (Trade Registration Service)
- In the client asset purchase transaction; Cash transfers are made from the Akbank free account at Clearing House (Takasbank) to the Ak Yatırım free account. (Trade Registration Service)
- Client investment portfolio and investment account statements are checked by the branch.
- The instructions and forms received for the transaction are scanned into the system by the branch staff.
- After the transaction is completed, a client order form is generated.
- Signature of the client is taken on the client order form and archived.

4.1 PUBLIC OFFERING PROCEDURES

- An IPO request form is received from the client. If the client has sufficient collateral in the Akbank system, the necessary information is entered through the system and the requests are forwarded to Ak Yatırım. Demand collection and collateralization transactions are carried out automatically by the Bank system, while demand distribution transactions are carried out by Ak Yatırım.

Public Offering Demand Collection Channels are as follows:

- Akbank Direct Internet Branch
- All Akbank Branches
- Client Contact Center

5. PRODUCT RISK STATEMENT FORMS

For Ak Yatırım clients;

- Risk Notification Form Regarding Lending Transactions,
- Foreign Equity Market Risk Information Form and,
- The Bank mediates the signing of the Foreign Derivatives Risk Notification Form.