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## 1. INVESTMENT FUND TRANSACTIONS

### 1.1 FUND TRANSACTIONS ON TURKEY ELECTRONIC FUND TRADING PLATFORM (TEFAS)

Brokerage activity is the transmission of purchase or sale orders related to capital market instruments belonging to clients to the Exchanges or other organized market places by investment institutions on behalf and account of the client. 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 Turkey Elektronik Fund Trading Platform, via Ak Portfolio Management Corp.

#### 1.1.1 Investment Fund Transactions 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 TEFAS 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.

- In case of there exists a problem during the CSD registration process, information can be obtained by contacting the Analytical Information Management team.

#### 1.1.1.1 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.

#### 1.1.1.2 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.

#### 1.1.1.3 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.

#### 1.1.1.4 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

#### 1.1.1.5 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. SECURITIES WITH FIXED INCOME

### 2.1 TRANSACTIONS WITH SECURITIES WITH FIXED INCOME

FIXED INCOME SECURITY transaction service can be provided to clients as a transaction intermediary (orders submitted to organizations authorized to organize and / or portfolio brokerage on behalf of clients). Clients can submit their FIXED INCOME SECURITY purchase and sale requests through branches or directly through the Treasury Business Unit. FIXED INCOME SECURITY purchase and sale requests of the branch are concluded without associating them with the bank portfolio after the transaction is completed.

Requests, which are realized through the front office by receiving written instructions from the branches, are sent to the back office after the branch is entered into the system. 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; The new Retail Banking Service Agreement / Technology Service Agreement Investment Services and Activities General Risk Notification Form and Debt Instruments Risk Notification Form are filled out and signed by the client. Afterwards, it is scanned and entered into the system
  - For the brokerage process, the client requested to fill out and sign the instructions.
  - It is checked whether the client has an investment account.
  - For clients who do not have an investment account, an investment account is opened upon client request.
  - It is checked whether the clients who have opened an account or have an existing investment account have CSD records.
  - CSD registration is obtained for clients without CSD registration.
  - The cash / nominal balance of the client accounts to be processed is checked. If the client notifies his request directly to the Treasury Business Unit, the control is carried out by the Treasury Business Unit. If there is a deficiency; It is completed by sending information to the branch.
  - The client's order is taken via registered phone number
  - The branch initiates the Request Entry of the transaction from the system.
  - When the product to be processed is selected, the system checks whether the Compliance Test is mandatory for the relevant product and a cut-off warning is given for clients who do not have a Compliance Test.
  - Compliance Test can also be done through Internet Banking; If it is done by our branches, the Compliance Test is filled and signed by the client and the answers are entered systematically. The Compliance and Appropriateness Tests will not be applied to clients with legal personality. If the test was taken through Internet Banking; If requested by the client, it is printed and delivered by the branch personnel from the system.
  - 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.
  - If the client wishes to do a different transaction than the profile determined by the test result, he / she makes a written statement "I accept the risk arising from this transaction" and the relevant area is defined in the system..
  - In line with the result of the Client Compliance Test, action can be taken for the appropriate product. According to this; For clients who do not comply with the conformity test result / who do not complete the commitment part, a business interruption message is provided.
  - 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.
  - For professional clients, the product-based risk notification form is optional and warning or interruptive message shall not be declared. For professional clients, obtaining the "Information Form on Regulations Provisions That Professional Clients Cannot Benefit from" will be a task interruption
  - System; transfers the transaction to the confirmation screen of the unit responsible for treasury operation.
  - The Back Office checks the actual transaction with the information about the brokerage transaction received from the Marketing unit, and the BIST transaction over the book record, but 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 instruction document received for the transaction is scanned into the system by the branch staff.
  - 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.
  - Once the client's trading account is available, the transaction is confirmed by the Back Office.
  - The transaction is completed by the branch with the client investment portfolio and investment account statement check.
- Upon completion of the transaction, a client Transaction Instruction and Result Form is produced; The client signature is taken on the form and the form is archived.

## 2.2 FIXED-INCOME SECURITIES TENDER BROKERAGE TRANSACTIONS OF CLIENTS

Providing brokerage fixed-income securities tender brokerage transactions may be provided to clients. Clients who had an investment account before the start of the compliance period will be qualified as "existing 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 will be referred to as "new clients". Business flow shall be as follows.

- For existing clients; Upon logging in to the Bank system by the branch personnel, an up-to-date BBHS / THS check is made and a warning is provided.
  - New BBHS / THS, Investment Services and Activities General Risk Notification Form and Debt Instruments Risk Notification Form are given to clients who do not have current BBHS / THS and are asked to fill in and sign. Forms are scanned and entered into the system
  - 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 BBHS / THS, 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 Tender Brokerage, the client transmits his instruction to the branch / directly to the treasury business unit.
- FIXED INCOME SECURITY is checked by the branch whether the client has an investment account or not.
- 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 accounts have CSD records.
- CSD registration is obtained for clients without CSD registration.
- The request of the client is forwarded to the relevant unit by the branch / entry is made through the system.
- Treasury Business Unit transmits the tender offer to the CBRT. The result of the transaction is reported to the client's branch.
- The cash / nominal balance of the client accounts to be processed is checked and, if there is any deficiency, the amount is completed in order for the transaction to be carried out.
- When the client's investment account becomes available, the transaction is confirmed.
- The transaction is completed by the branch with the client investment portfolio and investment account statement check.
- There is no institution authorized for order transmission and portfolio brokerage to work together within the scope of transaction brokerage activity.