



KUZEY KONAKZADE
FASHION HOUSE AND JEWELLERY BOUTIQUE

13/02/2025

ANTI-MONEY LAUNDERING POLICY

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Anti-Money Laundering Policy

This document was prepared by Kuzey Ümit Kargin on 13/02/2025. **Kuzey Konakzade Fashion House and Jewellery Portfolio** adopts the highest standards of integrity, transparency, and legal compliance in all of its operations. In particular, it fully complies with **U.S. laws and international regulations aimed at preventing money laundering (AML) and the financing of terrorism**. We ensure strict adherence to these policies in our digital style consulting, digital content, and jewellery design services. At Kuzey Konakzade, jewellery is solely composed of designs, and each design is produced and delivered only upon customer request. These designs are not sold as retail or wholesale products. Below, the measures and practices taken by Kuzey Konakzade within the framework of its AML policy are explained in detail.

Compliance with U.S. Anti-Money Laundering Laws

Kuzey Konakzade fully complies with the **U.S. Bank Secrecy Act (BSA), the USA PATRIOT Act**, and all other applicable federal and state laws aimed at preventing money laundering and financing of terrorism. The jewellery offered by Kuzey Konakzade consists solely of designs, not retail or whole sale products. These designs are produced and delivered exclusively based on customer requests. The custom-made designs produced in response to customer requests are not used to support money laundering or financial crime activities. All financial transactions are monitored and controlled in compliance with legal requirements.

Customer Identity Verification and Validation

Kuzey Konakzade adheres to the **Know Your Customer (KYC)** principles to verify the identities of its customers. Since jewelry designs are produced only at the customer's request, identity verification is carried out for each customer. This process includes collecting necessary documents such as identity, address, and other relevant papers to prevent money laundering and the financing of terrorism. The customer's identity is validated in accordance with legal regulations, and only legitimate and lawful transactions are conducted.

Monitoring of Transactions

Kuzey Konakzade rigorously monitors all financial transactions. All transactions related to jewellery design and digital services are tracked for suspicious activities to detect potential money laundering or other illegal activities. Any unusual transactions, such as large amounts, rapid transactions, or international transfers, are carefully examined. If suspicious activities are detected, they are reported to the relevant legal authorities.

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Risk Assessment and Detection of Required Situations

Kuzey Konakzade regularly conducts risk assessments. These assessments identify risks related to jewellery design and digital content services, and appropriate measures are taken to address these risks. Customers and transactions are categorized according to their risk levels, and transactions with higher risk are subject to more detailed scrutiny. Additional verification and auditing procedures are applied, particularly for customers requesting large amounts of jewellery designs or coming from high-risk countries.

Digital Products and Content

In addition to jewellery design services, Kuzey Konakzade also provides digital style consulting and content creation services. Digital content and consulting services are also subject to the same **AML regulations**. Payments for digital services are monitored and controlled for suspicious activities, just like those for jewellery designs. All transactions related to digital products and services are subject to procedures aimed at preventing money laundering and other illegal financial activities.

Reporting and Cooperation with Authorities

Kuzey Konakzade has a zero-tolerance policy towards criminal activities such as money laundering and terrorism financing. In the event that suspicious transactions are detected, they are reported in cooperation with the **U.S. Financial Crimes Enforcement Network (FinCEN)** and other relevant authorities. Kuzey Konakzade works in full compliance with law enforcement and other legal authorities, carrying out all necessary reporting and cooperation activities.

Conclusion

At Kuzey Konakzade, we uphold the highest legal and ethical standards in all of our activities, from jewelry designs to digital content and consulting services. The measures we take to combat money laundering and financial crime aim not only to prevent illegal transactions but also to protect our customers, society, and business.

The Business Manager Kuzey Ümit Kargin, affirms that he will adhere strictly to the regulations outlined in this document and is fully aware of his responsibilities in this regard.

For more information and inquiries, please contact us at **kuzeykonakzade@kuzeykaa.com**