

## I. PURPOSE AND SCOPE

This policy sets out the ethical principles of Türkiye İş Bankası A.Ş. (the Bank) and the responsibilities and working principles of its employees.

## II. OUR ETHICAL PRINCIPLES

Operating since 1924, our Bank plays a pioneering and guiding role in the Turkish banking sector with its unique vision, goals, values and strategies.

Believing in the importance of both a joint work culture and collective thought, and by internalizing these values, our Bank has always adopted a “people first” approach and aimed to achieve sound and sustainable growth in all areas. Therefore, by respecting the employees’ rights regarding unionizing and collective bargaining, our Bank regulates the employee and working life principles by Collective Bargaining Agreement.

Our Collective Bargaining Agreement states that the Bank and its employees shall place importance on the predominance of labor peace and ethical rules, that they shall make every effort to increase efficiency by working in harmony within the framework of an exemplary cooperation, believing that the results of their activities carried out for their common interests are reflected upon the balance sheet, and that our employees shall demonstrate that they deserve the reputation and reliability required by their positions, with their behaviors both within and outside the Bank.

In this sense, İşbank employees are required to comply with the ethical principles and code of conducts stated below when dealing with other employees, customers, other banks, official institutions, and other related parties.

- **Integrity:** We fulfill all transactions and requirements accurately and in line with the intended purpose, and we never compromise on integrity in our relationships.
- **Neutrality:** We make our decisions without considering race, ethnic origin, belief, status, gender, age etc., treat all our customers and colleagues equally, and reject all forms of discrimination.
- **Reliability:** We prioritize mutual good faith and understanding in our relations and provide the necessary information fully, timely and accurately in a clear and comprehensible manner.
- **Transparency:** We completely understand demands and needs and fully explain the benefits and obligations of transactions and services to the relevant parties in timely manner.
- **Accountability:** We record all our activities with the information and documents set forth by the legislation, take our decisions by evaluating these information and documents within the framework of the legislation and banking principles that we are subject to within the scope of our work and authorities, and store our records in accordance with the legislation and in line with their intended purpose, for using the same in reporting and audits.
- **Public Benefit and Respect for the Environment:** In all our activities, we prioritize sustainability and attach importance to providing public benefit in all areas of life such as economy, education, culture and health, as well as the principle of environmental respect/protection.
- **Customer-Oriented Approach:** We accurately and fully understand all the demands and needs of the customers and inform them about the risks and benefits that may occur, in an accurate and complete manner. We do not share misleading information with customers and we perform quality transactions in a swift, safe and lawful manner. We offer innovative and tailored products to ensure customer satisfaction and continuity of customer relations. We listen to all customer complaints and suggestions carefully and closely and ensure satisfaction by generating correct and appropriate solutions in accordance with the legislation.
- **Compliance:** We regulate our activities in accordance with national and international legislation along with the instructions and policies applicable to our internal practices. We take and implement all measures to prevent the performance of any illegal transactions or any attempt to facilitate such transactions as an intermediary and we cooperate with other banks and institutions in this respect. We protect the trade secrets and personal data of our bank and our customers within the framework of our information security policies and in line with the legislation.

### III. OUR RESPONSIBILITIES AND WORKING PRINCIPLES

We carry out all our activities in accordance with the Ethical Principles and Code of Conduct, as well as the regulations of our Bank and the legislation.

#### A. Regarding Our Customers:

##### ➤ We Know Our Customers

1. We know our customers, serve them through easy interactions and clear communication, and offer the products and services that would best suit their needs.

##### ➤ We are in Close Contact with our Customers

2. We constantly maintain close contact with our customers within the framework of professional business relations and we provide the necessary guidance for them to access our products and services in a swift, comfortable and easy way.

##### ➤ We Provide Correct Information to our Customers

3. We maintain clear, simple and thorough communication with our customers, do not include misleading, complex and contradictory statements or repetitive information in our communication, inform them about the prospective transaction, and provide information in line with the Bank's regulations regarding the cost, commission and fee rates/amounts to be applied for each transaction.

##### ➤ We Value Customer Experience

4. We provide useful and reliable products and services that show our understanding of and meet customers' needs.

##### ➤ We Ensure Customer Satisfaction

5. We approach our customers in a kindly and helpful manner and always keep our level of knowledge up-to-date in order to provide excellent services.
6. We resolve customer requests and complaints quickly and diligently and respond to them according to the time frames and rules set forth in the Bank's regulations and the legislation.
7. We record all customer requests and complaints and investigate the root causes of them in order to align our products and services with customers' needs and expectations, and share our findings and suggestions with the relevant units to improve customer experience.

#### B. Regarding Our Activities:

##### ➤ Quality Policy

8. We act with the consciousness of "**continuous improvement**" to provide quality products and services in line with customers' expectations and needs, to carry out activities aimed at keeping customer satisfaction at the highest level by building on the improvement and efficiency of processes, to meet the needs of our customers in the fastest, most effective and most accurate way through all channels by utilizing the latest technologies, and to ensure excellence in our activities.

##### ➤ Compliance Policy

9. We recognize the importance of ensuring regular compliance of the Bank's activities and employees' attitudes and behaviors with the legislation, regulations and standards, by implementing and managing the Bank's internal

policies, procedures, regulations, rules and instructions in a timely and up-to-date manner, at every level, based on values such as honesty and integrity and in line with the Bank's reputation. We also know that it is our primary duty and responsibility to maintain all activities in line and in compliance with the Bank's objectives and policies, as well as its regulations, rules and standards.

#### ➤ Risk Policy

10. We know that all activities of the Bank must be carried out in line with the risk policies and risk tolerance determined by the Board of Directors and in a risk-oriented manner; that the risks are measured and managed, risk limits are established, and the processes to be followed in the case of violations are determined according to our risk policies; and that maintaining the efficiency of risk control mechanisms and reaching the desired efficiency in the development of these mechanisms are the fundamental conditions for understanding all aspects of risk management. We perform a **Risk-Control-Compliance Analysis**, which covers the compliance of all products, services or activities offered to the internal or external customers of the Bank, which have the potential to generate direct or indirect income, and the income and expenses of which can be measured, with the legislation, bank's internal policies and rules, as well as with customary banking practices, and which further covers the identification of risks arising from these products, services and activities, and the evaluation of the implementation procedures to be followed in measuring, monitoring and controlling the risks so identified.

#### ➤ Compliance with the Competition Law

11. We believe that competitive advantage is achieved by developing innovative and customer-oriented products and services that meet the needs.

12. In all our activities and processes, we avoid any type of behaviors and decisions that may violate the regulations regarding the Competition Law and practices that may make the activities of competitors, other institutions and organizations more difficult, and avoid discriminating between buyers that are in equal status, or engaging in any practices that would restrict the alternatives of consumers/customers.

13. We know that any type of agreement, parallel behavior, collusion, and exchange of information that is sensitive in terms of competition, agreements, concerted actions and decisions that prevent, restrict and distort competition, as well as abuse of dominant position constitute a violation of the competition law, and we refrain from these practices.

14. We refrain from the exchange and communication of any type of information that is sensitive in terms of competition. If we suspect an anti-competitive practice, we record the objections regarding the subject and do not express an opinion on the matter; if the discussions continue, we leave the relevant environment where such discussions are held and notify the relevant authorities, as well as the Legal Consultancy Department.

15. We do not share information that restricts competition, either directly or indirectly with competing undertakings. In the event that this information is given to the Bank by competitors or requested from the Bank by them, we do not use this information in a way that would violate the competition law and related regulations. Instead, we respond by e-mail and written notification regarding the violation of the competition law and notify the relevant authorities and the Legal Consultancy Department.

#### ➤ Combating Financial Crimes and Enforcement of Sanctions

16. We embrace and value the combating financial crimes (*activities involving money laundering, financing of terrorism, misuse of information, or market fraud*) and sanctions (*regulations aimed at restricting or preventing economic activities of countries, individuals and organizations, individually or comprehensively, in order to achieve economic and political goals*) as a social responsibility and not merely for compliance with laws and regulations.

17. We know that the "**Know Your Customers**" is the main principle of combating financial crimes, and before establishing a business relationship with customers, we procure all information and documents required by the legislation regarding the customers and the activities of the customers, within the scope of our **Combating Financial Crimes and Sanctions Policy**, and perform the necessary checks.

18. We comply with international norms and national legislation regarding financial crimes and sanctions, and carry out the necessary procedures.

➤ **Anti-Bribery and Anti-Corruption**

19. We know that we are obliged to comply with the **Anti-Bribery and Anti-Corruption Policy**, which was adopted by our Bank's Board of Directors and entered into force on 31.12.2014. We do not make any payment, give gifts, or make any personal payments, aids or donations to any government official or any person that would influence any decision regarding the continuation of the Bank's activities or interests. We do not offer any facilitation payments in our relations with third parties.

20. We know that our Bank is prohibited from making political donations/contributions/expenditures and/or using its facilities and means to support any political party, political candidate or institution.

21. We do not request or accept gifts from third parties, including companies within the Bank's group, that contradict the provisions of our Bank's **Gifts and Hospitality Policy**, and we do not take actions which could be interpreted in that way.

22. We do not use our positions and authorities for our own personal or private gain or for that of our families or third parties in any way; we do not secure or promise any advantage for ourselves, our family or third parties, either directly, through an intermediary, or under any name whatsoever, whether through mutual agreement, deception, or coercion, by knowingly or willingly misusing our title or position.

➤ **Gifts and Hospitality Policy and Preventing Conflicts of Interest**

23. We know that conflict of interest includes any economic or personal interest that may be against the Bank's interests during any decision-making process or execution of activities, or that may become against the Bank's interests under changing conditions; and although it is natural and acceptable to engage in social relations with customers, these relations should not lead to conflict of interest.

24. We know that gifts are generally items given for the purpose of commercial courtesy or gratitude between persons in a business relationship, which do not require a monetary or non-monetary consideration in return, and that we cannot accept or ask for gifts in any way from customers or suppliers that provide goods or services to our working unit, or third parties with which we have business relations, including companies within the Bank's group.

25. We do not accept gifts from customers, directly or through intermediaries, that clearly exceed the normal value of gifts given as part of business and social relations. We know that these regulations also apply to gifts given to our family members as part of relationships formed due to our position.

26. We may participate in entertainment and dinner events organized for representation and hospitality purposes, provided that they are considered acceptable, reasonable and modest in the business life.

27. We act in line with the regulations in our **Gifts and Hospitality Policy** regarding the gifts we can accept, the procedure for recording, and other related matters.

➤ **Purchasing Policy and Relationships with Suppliers**

28. We know that, in line with our **Purchasing Policy**, the spouses of the employees working in the purchasing departments or approval authorities and their relatives, as well as other relevant person and companies stated in the policy, cannot directly or indirectly participate or make any offer in the purchases and sales to be carried out by the Bank.

29. We do not accept, directly or indirectly, any gift, bonus, donation, job offer, sponsorship, or any other transaction or treatment that provides any benefit or privilege and that would violate our **Anti-Bribery and Anti-Corruption** and **Gifts and Hospitality Policies**.

30. During the purchasing of products and services, we refrain from any activity that would hinder the process from being carried out in a fair, impartial, transparent and accountable manner.
31. In the case of detection of supplier activities that violate the policies and principles set forth in our Bank's **Human Rights and Human Resources Policy** and **Supplier Management Principles**, we inform the relevant unit of our Bank. We know that our suppliers must refrain from any unfair competition practice.

➤ **Information Security**

32. We know that ensuring information security across the Bank is of critical importance in terms of protecting our reputation, preventing financial losses and ensuring customer satisfaction; that aside from our obligation to keep Bank and customer secrets safe in line with the Banking Law and regulations based on that law, our responsibilities regulated by the Personal Data Protection Law demonstrate the importance of ensuring the highest level of information security at the Bank; that in addition to the technical and administrative measures taken for the protection of information assets, awareness and sensitivity on the subject should be at a high level and the legislation, internal regulations, announcements, training and other information-sharing activities should be strictly handled.
33. We carry out all activities and transactions of the Bank in accordance with the principles set forth in the **Information Security Policy, the Personal Data Protection Policy, the Policy on Protection of Special Categories of Personal Data, and the relevant legislation**. During the information and document exchanges we carry out with the relevant units and branches of the Bank and among ourselves, we refrain from information/document transfers beyond the minimum level that will meet the clearly-defined business needs.
34. We examine the purposes of obtaining, using, storing and sharing information and documents and destroy the information and documents the storing of which cannot be based on any valid reason. We store and destroy personal data in line with the principles stated in the **Personal Data Storage and Disposal Policy**.
35. We value confidentiality during the provision of services to our customers. While performing a customer's transaction, we should be careful to ensure that the documents belonging to other customers are not visible in the service area, and that the information of other people are not displayed on the computer screen, and that the information is not shared loudly when communicating with a customer in the waiting area. In other words, we ensure privacy.
36. We protect information regarded as **Insider Information**, which expresses information, events and developments that have not yet been disclosed to the public and that may affect the value or price of capital market instruments or the investment decisions of investors, while performing our activities regarding the Bank or carrying out businesses and transactions on behalf of the Bank, as long as the relevant information remains an "insider information"; even when our duty at the Bank comes to an end, we do not use/disclose this information for the purpose of directly or indirectly securing any gain for ourselves or third parties, or in any other way, and we ensure that it is not used/disclosed in this sense; we show the utmost care and diligence to ensure the confidentiality of the relevant information and to prevent third parties from accessing it.
37. We use all devices allocated to us by the Bank to maintain our activities, such as phones, computers, etc., for the purpose of meeting business needs and in line with the rules set by the Bank. We are careful to ensure their safety and know that they are subject to inspection.
38. We strictly comply with this rule and the legislation also when using information systems, and refrain from using information systems beyond our authorization and any other action that may pose a risk for the Bank. We benefit from the information provision, training and awareness activities on this subject.
39. We know that cyber security is not only within the responsibility of specific teams and that individuals also play a big role in ensuring security at corporate scale, and we take the necessary individual security measures with the understanding that we are a link in the chain.

40. With the information we have obtained from the awareness programs and training activities carried out in our Bank, we put special emphasis on ensuring that our digital footprints do not contain unnecessary details and we adopt a vigilant and cautious attitude against phishing attacks at all times.
41. We ensure that identified security incidents or suspicious activities are immediately reported to the relevant units.

### **C. Regarding Each Other:**

#### ➤ **We Work for Our Common Interests**

42. By internalizing our Ethical Principles and Code of Conduct, we work for our common interests in harmony and with exemplary cooperation.

#### ➤ **Human Rights and Equal Opportunity**

43. We give importance to fulfill the requirements of the international conventions, to which our country is a party, notably the United Nations' Universal Declaration of Human Rights and the International Labor Organization's basic principles, such as labor rights, human rights and social justice.
44. We share our basic human resources processes such as recruitment, career management, remuneration, performance management and termination of employment, in an open and transparent manner by prioritizing the principle of equal opportunity. We adopt a high performance culture and support professional and personal development through training and continuous feedback and we regularly provide training activities to develop competencies and enhance personal developments.
45. We reject all forms of discrimination among our employees and make all decisions about our employees without taking into consideration race, ethnic origin, language, belief, gender, age etc.
46. We refrain from action that may lead to any form of mistreatment, discrimination or harassment, and in the case of such situations, we make notifications through the specified communication channels or by applying to the Union.
47. We do not make false statements that may harm the honor and dignity of persons, organizations and institutions or do not make false, derogatory denunciations or complaints with the aim of discrediting those, or charging with a crime without a concrete basis by the way of attacking the rights of persons or institutions protected by law and/or their credibility.

#### ➤ **Labor and Workplace Peace**

48. We view our human capital, which works with a sincere effort and devotion at every level, to be our most valuable asset. Our top priority is the health, peace and happiness of our employees adopting a working approach that is worthy of being a member of İşbank.
49. In order to ensure labor and workplace peace, we act in line with the regulations regarding work life stated in the ***Human Resources Function Regulation*** and other relevant directives.

#### ➤ **Work Approach**

50. We participate in teamwork activities and work collaboratively in line with our duties, responsibilities and regulations.
51. We comply with our work hours and we do not deal with works that are not related to our job during work hours. We pay attention and show the necessary courtesy to customers, provide clear and transparent information about our products and services, and fulfill the transactions and requests of our customers in a timely and complete manner as per our procedures and regulations.



52. We know that our personal rights such as relocation and promotion are evaluated objectively according to our pre-established rules and principles and we do not use intermediaries in these matters.
53. We transmit the information and documents requested by the official authorities in a timely manner and in line with the regulations specified in the law and we seek the opinions of our relevant legal units in the case of any doubts or when necessary.
54. We protect the secrets of the Bank and our customers and comply with the Banking Law and relevant legislation.
55. We act in accordance with the Personal Data Protection Law and information security regulations while processing the personal data we have access to as part of our work.
56. We do not make the Bank cover the expenses that we have to pay personally. We do not provide false statements and/or notifications to the Bank.
57. We make expenses in line with our ***Business Trip Expense Regulation*** in business trips and apply for the necessary approvals in advance.
58. We do not make transactions with information that does not reflect the truth in order to benefit from the Bank's rewarding practices.

➤ **Occupational Health and Safety**

59. We aim to provide a safer and healthier work environment and conditions for employees, stakeholders and customers in line with the legislation on occupational health and safety and to take all necessary measures in this regard as a core principle and we work in line with the ***Occupational Health and Safety Policy***, the legislation and other relevant regulations in this context.
60. We attend occupational health and safety trainings, regularly provide the necessary and up-to-date information and guidance, spread preventive healthcare practices, and follow the legislation and procedures to ensure occupational health and safety.

➤ **Social Life and Social Media Activities**

61. We do not engage in practices and behaviors that may damage the trust and stability or harm the reputation or interests of the Bank, other banks or the sector.
62. We do not use the Bank's name, logo or registered trademarks, or images or signs that resemble them, on the internet and other communication platforms.
63. We protect the copyrights and all rights of individuals protected by laws and we do not engage in any discourse or behavior that may violate the law and the Bank's regulations.
64. On social media platforms, we strictly comply with the legislation with respect to other banks, parties related to the Bank, our business partners, other employees, shareholders, suppliers and other third parties and we comply with the regulations specified in the document ***Principles For The Bank's Employees' Activities on Social Media***.
65. We inform the Human Resources Management Department before performing activities such as writing and publishing books, articles etc.
66. Apart from being a member in associations, foundations and civil society organizations, we notify the Human Resources Management Department in advance in the case that we assume any duty in these institutions.

➤ **Media Relations**

67. We do not share any articles, statements or information about the Bank or the Bank's policies to the media or anyone associated, and do not carry out such actions on the internet or similar communication media, without the Bank's permission.

➤ **Financial Obligations**

- 68. We take loans only at a level that is appropriate to our income, pay our debts on time, and do not assume any obligation that would exceed our financial capacity.
- 69. We do not carry out uncontrolled capital market transactions that would constitute gambling and/or speculative/leveraged financial transactions, in the hope of obtaining high returns beyond the purpose of making use of investments.
- 70. We do not give loans to customers in cash or on account, we do not take loans from the Bank's customers on behalf of ourselves or our family members and we do not allow customers to use loans from the Bank in our favor.

➤ **Commercial Activity or Additional Employment**

- 71. We may not work or take part in any other non-continuous paid or unpaid job within or outside our leave periods.
- 72. We do not directly or indirectly engage in activities that are considered to be activities of tradesmen or merchants, we do not work in any other paid job even outside working hours, we do not engage in self-employment activities, and except for the additional duties assigned by the authorized units of the Bank in accordance with the internal regulations, we do not hold titles such as Auditor and Member of Board of Directors, or physically act as a manager, in any company or business or industrial establishment.

➤ **Use of Bank's Assets**

- 73. We carefully keep the Bank's ledgers, records, and documents related to our work, in line with the legislation.
- 74. We use vehicles, machinery, installations, computers or similar equipment that are assigned to us to use or maintain, in line with the legislation and their intended purpose and we do not install unauthorized software on them.

➤ **Password Security**

- 75. We do not give out the passwords that belong exclusively to us or that are used in the computer system of the Bank or other equipment and acquire the passwords of others, and also we act in line with password security requirements.

**D. Regarding Our Future:**

- 76. We are mindful about the environmental and social impacts of our activities, take into account the effects of climate change and the risks and opportunities associated with it, and contribute to the global fight against climate change.
- 77. In order to reduce the negative effects we create on the environment, we aim to improve our performance in energy consumption, water use and greenhouse gas emissions, as well as waste generation, recycling and similar issues.
- 78. We aim to align our sustainability practices with international best practices through engagements.
- 79. As an organization that supports the UN Sustainable Development Goals, we contribute to social welfare and aim to be a part of the solution to global problems with the services and financial support we provide, as well as our long-term social responsibility projects.
- 80. We ensure gender equality in all our activities and aim to create opportunities to raise awareness on the issue. We work to ensure that this approach is adopted by all stakeholders in our value chain.



## IV. NOTIFICATION OF NON-COMPLIANCES WITH ETHICAL PRINCIPLES AND CODE OF CONDUCT

All our activities at our Bank are carried out in line with the Ethical Principles and Code of Conduct, our Bank's policies and internal regulations, and national and international legislation. The basic principles and code of practice regarding the notifications to be made to our Bank in the case of a violation or suspected violation of these regulations are stated below.

### A. Basic Principles

1. In the case of a violation or suspected violation of the regulations, notification is made through the communication channels listed below.
2. Notifications are taken seriously and handled and finalized swiftly. In the case of a violation of the regulations, the enforcement of all necessary sanctions, including the termination of employment contract as per the legislation, may be considered. Judicial bodies are notified in the case that the applicable legal requirements are met.
3. Employees who make notifications about the above-mentioned actions in good faith will not be subjected to practices such as disciplinary punishment, disadvantageous treatment compared to peers, or direct or indirect retaliation, solely because of their notification.
4. The Bank takes all the necessary precautions, including primarily those related to confidentiality, to prevent its notifying employees from becoming the target of any mistreatment of other employees or third parties. However, the Bank's rights arising from the legislation, contracts to which the Bank is a party and the Bank's internal regulations, are reserved for the employees and third parties who make notification in bad faith.

### B. Code of Practice

1. The confidentiality of the notifications is essential and the identity of the person making the notification is kept confidential unless he/she wishes it to be disclosed. Even if the Bank's employee conveys his/her suspicion about the non-compliance in question to his/her own manager or to the authorized units of the Bank, the principles regarding the confidentiality of the notification still apply. Confidentiality principles apply to notifications made by third parties as well.
2. Notifications can also be made anonymously. However, anonymous notifications may make it difficult to reveal the acts and/or perpetrators that violate the legislation and it may not be possible to take protective measures for the notifying party. No liability can be attributed to the Bank in such cases.
3. In order to take action to fulfill the needs of the notifications, the notification must be sufficiently clear and detailed and contain the necessary information. Claims with ambiguous statements or without explanations that demonstrate sufficient suspicion may lead to inconclusive investigations. In such cases, notifying parties are obliged to provide sufficient explanation and information to the Bank upon request.
4. Employees or third parties who suspect that an act is in violation of the regulations have the right to consult their manager or the responsible unit specified in the "Notification Channels". In the case of consultation, the procedures and principles regarding notification, particularly confidentiality, apply.
5. The notification must be made through the communication channels specified below. The Bank's employees and/or units receiving notifications outside of these channels are obliged to share the relevant notification with the communication channels specified, without delay and within the framework of confidentiality principles.
6. As a result of the impartial and independent evaluations of the Board of Inspectors regarding the notifications shared through the Ethics Line, it may be decided to conduct an investigation or to share the notification with the relevant units of the Bank for evaluation, inspection and finalization thereof. The Board of Inspectors submits the reports to the Human Resources Management Department when necessary. The Human Resources Management Department finalizes the submitted reports within the scope of its duties and authorities or submits it to the Bank's Executive Board or Board of Directors for finalization. Notifications shared through the Ethics Line are recorded by the Board of Inspectors.

7. All notifications with sufficient explanation and information are handled with due care by the Bank. The notifying party is informed about the notification being evaluated, through the contact information he/she shared.

### **C. Notification Channels – Ethics Line**

Within the framework of these principles, our Bank can be notified via the communication channels specified below.

#### **Ethics Line**

Email: etik@isbank.com.tr

Phone: +90 212 316 14 44

Mail Address: Türkiye İş Bankası A.Ş. Etik Hat İş Kuleleri Kule 1 Kat 34 34330 Levent-Beşiktaş/İSTANBUL

Notification Channels are published on the Bank's website and are open to the access of our Bank's employees, customers and all other relevant parties.

### **V. SUPERVISION/AUDIT**

Bank supervises compliance with the Ethical Principles and Code of Conduct in its internal control and internal audit activities to ensure that all activities comply with the Ethical Principles and Code of Conduct. The supervision/audit of compliance with the Ethical Principles and Code of Conduct is carried out under the responsibility of the Board of Directors. Supervision activities regarding compliance with the Ethical Principles and Code of Conduct are carried out under the responsibility of the Deputy General Manager responsible for Internal Systems. Internal audit activities within this scope are carried out by the Board of Inspectors, which operates under the Audit Committee.

The Bank provides regular training to its employees on the Ethical Principles and Code of Conduct. Employees sign a document declaring that they accept to comply with the Ethical Principles and Code of Conduct and the consequences of violations.

### **VI. REVIEW**

The Deputy Chief Executive, which the human resources function reports to, is responsible for the Ethical Principles and Code of Conduct, and reviews the Ethical Principles and Code of Conduct at least once a year, in line with the changes in operating conditions, compliance and requirements. The necessary updates and changes are approved by the Board of Directors and subsequently enter into force.

### **VII. EFFECTIVENESS**

This Ethical Principles and Code of Conduct has been approved by the Board of Directors and entered into force on the date of 26.10.2021.

This Ethical Principles and Code of Conduct is published on our Bank's corporate website.