

A&T BANK'S CODE OF CONDUCT AND ETHICAL PRINCIPLES

I. PURPOSE AND SCOPE

Arap Türk Bankası A.Ş. agrees that “Code of Conduct and Ethical Principles” are the rules that we will apply in any business and operation that we conduct with our stakeholders, customers, employees, and other banks and institutions.

Arap Türk Bankası A.Ş.’s “Code of Conduct and Ethical Principles” are a part of “Personnel Regulation” and “Disciplinary Regulation” all staff of the Bank are subjected to these principles.

Any employee, who was found to act in contradiction with these principles, shall be subjected to the sanctions, described in “Labour Law and Collective Agreement” and related legislation and Bank’s “Personnel Regulation” and “Disciplinary Regulation”.

By signing this document herein, the Bank’s staff undertakes to act in accordance with the Bank's policies and procedures as well as laws, regulations, and other arrangements.

II. DEFINITIONS

Bank : Arap Türk Bankası A.Ş.

Employee : The staff of Arap Türk Bankası A.Ş.

III. COMPLIANCE WITH LAWS AND REGULATIONS

a) Employee must learn the principles, mentioned in the procedure that was prepared for implementation of “Law on Prevention of Laundering Proceeds of Crime” No. 5549, relevant regulations, circulars, and communiqués, and always take these principles into consideration while performing and applying the transactions. Employee carefully examines and avoids performing any operation and transaction, which they know or reasonably suspect that it has a relationship with the operations for laundering criminal proceeds and/or financing terrorism. Employee acts in compliance with this rule and does not allow any transaction that might impair the Bank's reputation.

Employee must certainly contact with our Bank's Compliance Officer for any suspicious transaction and/or hesitated case.

Identities of employees, who have made such notifications, are kept secret and all necessary measures are taken to prevent any unjust treatment that they may suffer.

Compliance Officer	uyumbildirim@atbank.com.tr
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- b) Employee must perform the operations and transactions in accordance with the law, legislation, ethical principles as well as policies and procedures of our Bank, and standards of production/quality/service.
- c) Employee must take necessary measures as a part of his responsibility to not to disclose, keep confidential and diligently any information about the Bank and its customers to any person other than those that are clearly authorized according to the laws. He/she represents our Bank in the best manner both during and out of the work.
- d) Employee is responsible to ensure that the reports, which must be provided by our Bank to official authorities and public entities and organizations, are complete, accurate, true, and understandable and are submitted on time.
- e) Employee must notify the Head of Inspection Council of our Bank for any attempt of fraudulence and counterfeiting that he/she has learned or suspected and any practice and behaviour that contradicts with laws and regulations.

Such information may either be notified in written or through electronic means

Identities of employees, who have made such notifications, are kept secret and all necessary measures are taken to prevent any unjust treatment that they may suffer.

Head of Inspection	teftisbildirim@atbank.com.tr
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IV. RULES FOR CONFIDENTIALITY AND KEEPING SECRET

Information Security:

- a) Employee must comply with "Information Security Policy Procedure" and "Policy for Acceptable Utilization of Information Systems" that have been and will be published by the Bank.
Since laptops and other movable devices are highly exposed to the risk of theft, they must not be left at insecure places. Employees must certainly lock their computers or logout from the system before leaving their computers unattended.
- b) User ID's or passwords of employees are personal and they must not be shared with any person.
- c) Employee pays attention not to leave business related information visible on computer screen and/or his/her screen not to be seen by customers even if he/she has left his/her place for a short term. Attention is paid for complying with the clean desktop policy.

- d) Employee is responsible to report all security incidents and threats that might impact information security to Information Security Officer. Occurrence date and time of the incident, the incident's location, the person that has made the action and details of incident must be reported to the officer in order for reporting the observed incident. Employees must not try to prove any security incident while reporting it.

Identities of employees, who have made such notifications, are kept secret and all necessary measures are taken to prevent any unjust treatment that they may suffer.

Information Security Officer	biliguvenligi@atbank.com.tr
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Utilization of Information Systems and Other Bank Assets

- a) A&T Bank's information systems and other assets belong to the Bank and they must be used for business related operations principally. Employees are liable to protect and use the Bank assets efficiently. Personal utilization of assets should be performed only in case of a requirement and at the minimum level in a manner so as not to interrupt the Bank's operations and assets must not be used in any manner that contradicts with the laws or ethical principles. If the cost of personal utilization of assets by the employee (in terms of money and/or time) will exceed a reasonable level, he/she must obtain approval of his/her supervisor. If there is any doubt about the significance of cost, the line manager must be consulted.
- b) A&T Bank's Internet and Intranet system is intended for business related transactions, communications, and researches. Employees agree that the Bank's management can audit e-mail communication made through their e-mails with “atbank.com.tr” domain and their Internet navigation without any prior notification in order to ensure and audit the Bank's security, they will not raise any objection for such purpose and they will exactly comply with the relevant instructions. Common sense must be the guide for suitable internet utilization.

The following are prohibited:

- Unauthorized utilization of Internet connections of third parties within the office (GPRS cards, wireless Internet, etc.);
- Installing unapproved and inappropriate files or software to the Bank's computers;
- Visiting any website that falls within the categories prohibited by Policy for Acceptable Utilization of Information Systems.

Customer's Secret and Bank's Secret:

- a) Employee must keep any information and document of the customer secret and carefully, except for the information and documents that must legally be given to authorized persons and entities. As required by Banking Law the shareholders, members of Board of Directors, any person and officer acting on behalf of them and those who, by virtue of their positions or in the course of performance of their duties, have access to confidential information about banks or clients are not permitted to disclose such confidential information to any person or entity other than the authorities expressly authorized by law. The outsourcing institutions from which the Bank receives support services and the employees of such institutions shall also be subject to this provision. Such obligation shall continue after leaving office.
- b) Employee cannot disclose any communication and information and cannot make any speech to media organs and their members regarding the Bank, Bank's strategies, business principles and any confidential subject without permission of his/her supervisor and General Manager.
- c) Employee avoids participating the discussions in social or private meetings regarding the Bank's confidential information or customers' financial statuses.
- d) Employee gives any assistance to internal and external audit staff and does not hide any information and document during the audits, inspections and investigations to be conducted.
- e) Employee cannot abuse any information about the Bank and his/her colleagues for his/her or third parties' benefit.
- f) Employees cannot use the Bank's logo, part of the logo, corporate visuals, logos and corporate identity designs in intra-bank and non-bank activities without Support Services and Communication Department's approval. The corporate identity standards, which is determined and registered by the Bank, can only be used in printed documents and web pages directly related to the Bank.

V. LIABILITIES TOWARDS THE BANK

- a) Bank's employees must avoid from any action, operation, transaction and take necessary actions to prevent them that will damage the Bank while performing their duties. If any opportunity arises in favour of the Bank, employee must benefit from such legal business opportunities.

- b) Employee avoids to cause situations that will or be assumed to lead any conflict of interest in favour of him/her or his/her relatives and cannot be involved to decision making process for cases that relate to his/her or his/her relatives' interests.
- c) Employee cannot request any value from third parties in order to perform any task under his/her responsibility and, if such a value is given, cannot accept it.
- d) Employee cannot directly or indirectly give favour to himself/herself or other persons in return for a private benefit and in an unfair manner and cannot promise to give any favour to real persons or legal entities.

VI. PROTECTING RESOURCES AND ASSETS OF THE BANK

- a) Employee pays utmost attention and care to the utilization of any good, asset, tool, and equipment provided to him/her by the Bank. Such tools and equipment cannot be used by any relative of any employee or any other person for personal interest.
- b) Employee cannot use the Bank's resources, information, relationships and his/her position in the Bank in order to achieve any personal benefit.
- c) Employee performs any procurement, sale, and any other action to be performed on behalf of the Bank by protecting the Bank's interests. He/she follows a transparent policy in selecting goods, services and suppliers in a manner so as to protect the Bank's prestige.
- d) Employee pays utmost attention in using the Bank's sources, such as electricity, water and stationary.

VII. RULES TO BE FOLLOWED AT THE WORKPLACE

- a) Employees pay attention to their appearance and behaviours in order to represent the Bank's reputation and prestige in the best manner. All employees must always be neat, well-groomed, and meticulous, and must choose clothing and accessories that is appropriate for the work environment and their physique, and in line with banking.
- b) Employees cannot get into debt and surety relationship with each other.
- c) Employees cannot smoke in closed areas in a manner so as to disturb customers and other employees and to interrupt his/her tasks according to relevant laws and the Bank's procedures.
- d) Employees cannot behave derogatorily to his/her colleagues and other staff reporting to them and cannot apply psychological pressure on them. They always act kind, ethical and prudently to their colleagues.

VIII. ISSUES TO BE PAID ATTENTION OUT OF THE BANK

- a) Employees cannot perform any work that might directly or indirectly cause them to be considered as a merchant or artisan ("Commercial Enterprise" or "Artisan Enterprise").

They might be a shareholder of any company other than our Bank's affiliates but they cannot assume any task that requires any representation and binding function. These employees cannot be involved in the credit allocation processes in relation to their companies.

- b) Employees can assume a task in foundations, occupational and social societies and charity funds and be a member of any political party, provided that they do not hinder the working hours and order. However they cannot be a founding member of any political party and they cannot make propaganda within the Bank for the political party, to which they are a member.
- c) Employees must adopt a lifestyle that does not cause any negative opinion about the Bank and that does not contradict with the rules of society in their business and private lives. They must pay attention to have a lifestyle in parallel with their income and must pay attention to pay any debt that they have received through personal credits. They cannot become indebted by spending money in the amount that doesn't suit to their economical power or their social status.

IX. RELATIONSHIPS WITH CUSTOMERS

- a) Employees cannot enter into any relationship with the customers that do not comply with ethical principles, such as debit-credit relationship, being the guarantor, or opening a joint account.
- b) Employees must provide complete and clear information to the customers and must not mislead them in order to gain more profit.
- c) Employees must inform the customers for their rights and liabilities in their operations and transactions made through the Bank as well as all benefits and risks arising out of the products and services being offered to them.
- d) Employees cannot defame other banks to the customers even for purposes of creating an opportunity on behalf of the Bank.
- e) Employees avoid to be rude, uninterested or to act in a humiliating manner to the customers, talk and treat them calmly and gently.

X. RULES FOR ACCEPTING AND GIVING GIFTS AND DONATIONS

- a) Employees cannot receive cash or any gift that can be converted to cash from customers, suppliers or third parties.

- b) Employees cannot accept or request any gift, entertainment or other presents, which are being offered with the intention to influence the Bank's preferences and decisions.
- c) Employees pay attention that any gifts to be given to customers, suppliers and other persons in special days, such as festivals, Christmas, are reasonable.

XI. OTHER

Regarding issues related to the bank's working arrangements, any complaints, reports, or notifications concerning actions or behaviours that do not comply with the "Labor Law and Collective Agreement," the "Personnel Regulations," the "Disciplinary Regulations," and other internal regulations and procedures should be addressed to the managers responsible for Human Resources Management at the Bank.

Identities of employees, who have made such notifications, are kept secret and all necessary measures are taken to prevent any unjust treatment that they may suffer. Subject is resolved by transferring the situation to the highest level in full secrecy.

Human Resources Management	<u>etikbildirim@atbank.com.tr</u>
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